

# EXHIBIT I

IN THE UNITED STATES DISTRICT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

MARNIE O'BRIEN,

Plaintiff

vs.

MIDDLE EASTERN FORUM,  
DANIEL PIPES (individually),  
and GREGG ROMAN  
(individually),

Defendants

2:19-cv-06078-JMG

GREGG ROMAN,

Counterclaim and Third-Party  
Plaintiff

vs.

MARNIE O'BRIEN,

Counterclaim Defendant,

and

MATTHEW EBERT,

Third-Party Defendant

--oOo--

DEPONENT: MATTHEW BENNETT

TAKEN BY: Plaintiff

DATE/TIME: Tuesday, January 12, 2021  
9:09 a.m.

PLACE: Zoom Videoconference

REPORTER: Joyce A. Wise, RMR  
Notary Public

1  
2 APPEARANCES:

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18  
19 ALSO PRESENT:

20 Jakob Williams

21 Mark Fink, Esquire  
22 Middle Eastern Forum In-house Counsel

23 Jason Brockman

24 Ken Amrhein, Video Specialist

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EXAMINATION

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1 THE VIDEOGRAPHER: Okay. We are  
2 now on the record.

3 Today's date is January 12, 2021,  
4 and the time is 9:09 a.m. Eastern.

5 This is a recorded video  
6 deposition of Matthew Bennett taken in  
7 the matter of Marnie O'Brien versus  
8 Middle Eastern Forum, et al, the United  
9 States District Court for the Eastern  
10 District of Pennsylvania, Case Number  
11 2:19-CV-07078-JMG.

12 My name is Ken Amrhein from  
13 Everest Court Reporter. I'm the video  
14 specialist. The court reporter is Joyce  
15 Wise from Everest Court Reporting.

16 All counsel appearing today will  
17 be noted on the stenographic record.

18 Will the court reporter please  
19 swear in the witness?

20 MATTHEW BENNETT,  
21 called upon by Defendant to give testimony, being  
22 duly sworn or affirmed by me, testified as  
23 follows:

24 EXAMINATION

1 BY MS. SHIKUNOV:

2 Q. All right. Good morning,  
3 Mr. Bennett.

4 We are here today to take your  
5 deposition, which is effectively an  
6 information-gathering exercise prior to summary  
7 judgment motions and trial.

8 In light of that, there is a court  
9 reporter who is virtually here this morning.  
10 She's taking down everything we say.

11 What that means is that we cannot  
12 speak at the same time, particularly over the  
13 Zoom platform.

14 So that can feel a little  
15 unnatural. Where I run into trouble with it is I  
16 start to ask a question, you know where the  
17 question's going and you want to start to answer  
18 as if we were in a conversation.

19 It's important that you let me  
20 finish the question so she can take it down  
21 accurately.

22 Likewise, I may think you're done  
23 with an answer, but you're not done, and I may  
24 start to speak.

1 I will immediately stop speaking,  
2 if that's happening. I will never cut you off  
3 and I will always let you complete your answer.

4 Do you understand all of that?

5 A. Yes.

6 Q. Okay. The other thing, because we  
7 have a court reporter here today, it's important  
8 that all your answers are verbal.

9 So I need a yes or a no or a word.  
10 If you give me an uh-huh or an huh-uh or nod or  
11 shake your head, which I promise you'll do at  
12 least once, I will just remind you to answer  
13 verbally.

14 Okay?

15 A. Yep.

16 Q. I may ask you a poorly-worded  
17 question this morning. I'm not scripted. It  
18 happens as we speak.

19 If you do not understand a  
20 question that I've asked of you, let me know that  
21 you don't understand the question and I will  
22 happily rephrase it.

23 If you don't know or can't  
24 remember the answer to a question I ask you,

1 those are fabulous answers to a question.

2 If you do answer a question, we  
3 are going to assume that you've understood the  
4 question and that you knew the answer to the  
5 question.

6 Do you understand?

7 A. Yes.

8 Q. We can take a break at any time.  
9 The only caveat to that is you do need to answer  
10 any question that's open before you.

11 And finally, sir, are you under  
12 the influence of any medication or substance that  
13 would impede your ability to testify truthfully  
14 here this morning?

15 A. No.

16 Q. Do you have a medical condition  
17 that would make it difficult for you to testify  
18 truthfully here today?

19 A. No.

20 Q. And do you agree to read and sign  
21 the transcript for accuracy?

22 A. My audio cut out.

23 Q. Do you agree to read and sign the  
24 transcript for accuracy?



1 A. Sure.

2 Q. Okay. Sir, preparing for today's  
3 deposition, did you review any documents?

4 A. I received an e-mail from Jakob.

5 MS. DiBANCA: That's counsel. So  
6 I'm just going to interrupt --

7 BY MS. SHIKUNOV:

8 Q. Yeah. Don't tell me anything that  
9 counsel said.

10 If you reviewed an e-mail from  
11 counsel, that's sufficient.

12 A. No, I -- yeah, I didn't review it.  
13 But I didn't really have time to go through  
14 documents. But, yeah, I glanced at some stuff.

15 Q. So other than -- did you review  
16 any prior deposition transcripts or the complaint  
17 or anything like that is more what I'm interested  
18 in?

19 A. No.

20 Q. Okay. Have you given a deposition  
21 before?

22 A. Yeah, once about, I think, a month  
23 ago. Something like that.

24 Q. And was that in the Lisa Barbounis

1 versus MEF matter?

2 A. Correct.

3 Q. Other than that deposition, have  
4 you ever given a deposition previously or  
5 testified at all in a legal proceeding?

6 A. No.

7 Q. Okay. Sir, when did you -- you  
8 used to work for the Middle East Forum, correct?

9 A. Correct.

10 Q. When did you start?

11 A. I believe it was summer of 2016.

12 Q. Okay. And what job were you hired  
13 in to perform?

14 A. I was hired as the Director of  
15 Special Projects.

16 Q. And who hired you?

17 A. Daniel Pipes, Gregg Roman and I  
18 think those are the only people I interviewed  
19 with.

20 Q. Did you have a prior relationship  
21 with Daniel Pipes, meaning prior to joining the  
22 Forum?

23 A. No.

24 Q. What about with Mr. Roman?

1 A. Yes.

2 Q. How did you know Mr. Roman?

3 A. We attended the same university  
4 in, I believe, 200 maybe 3. So I've known him  
5 now 17 years, something along those lines.

6 We played flag football against  
7 one another maybe in, I think, fraternity  
8 football, something like that.

9 Q. And what university was that?

10 A. American University in Washington,  
11 D.C.

12 Q. Have you continued your social  
13 relationship with Mr. Roman after leaving the  
14 Forum?

15 A. Yeah. We speak about maybe once a  
16 month on average.

17 Q. How would you characterize your  
18 relationship with Mr. Roman?

19 A. It's good. Not what it used to  
20 be. But, you know, we were friends for a while  
21 and then not and now we are again. At least from  
22 my perspective.

23 Q. Did Mr. Roman introduce you to the  
24 Forum? Like is he how you got your job there?

1           A.           I knew about the Forum. I was  
2 working at another organization and we hosted an  
3 event and he was one of the panel speakers at the  
4 event.

5                       So that's when I came to learn  
6 about the work that he was doing and then we  
7 had -- you know, through that gotten back in  
8 touch.

9           Q.           So you -- you started your work  
10 for the Forum as the Director of Special Projects  
11 in 2016, is that the position you held throughout  
12 your entirety of your time at the Forum?

13           A.           No. I think the end of 2016, I  
14 took on the responsibilities of the Director of  
15 Development and I stayed in that role until --  
16 for the entire time.

17           Q.           Okay. And was that -- can you  
18 describe to me the change in roles there?

19           A.           Sure. Can you hold on one second?  
20 Sorry.

21           Q.           That's okay.

22           A.           What was the last question?

23           Q.           I was just asking for you to  
24 describe the change in positions.

1           A.           Change in position was -- I was  
2 six months in to the role of the Director of  
3 Special Projects. The person who was  
4 occupying -- or who had that role, the Director  
5 of Development, was let go and I took on those  
6 responsibilities.

7           Q.           Who was let go?

8           A.           Her name was Tiffany Lee.

9           Q.           Are you aware of the circumstances  
10 under which she was let go?

11          A.           Not -- well, I think I am anyway,  
12 but -- I interviewed originally for that position  
13 and I believe I reported to Tiffany 70 percent of  
14 the time, Gregg the other 30 percent of the time.

15                   So as a member of the, I think,  
16 development team and the staff, she would, you  
17 know, manage my day-to-day activities.

18                   A couple months into the job,  
19 myself and another -- another member of the  
20 development -- or another, you know, colleague  
21 started to receive assignments they thought were  
22 odd.

23                   And we didn't raise any sort of  
24 flags about them, but it continued on for a

1 while.

2 It became, I guess, clear to me  
3 that maybe she didn't have the credentials that  
4 she said she had or that she wasn't able to do  
5 the job that she was tasked in doing, database  
6 migration, run the national fundraising campaign,  
7 manage the day-to-day staff.

8 She was yelling at janitors in the  
9 building. I think she was vocal with other  
10 members of the office.

11 And so finally I did raise an  
12 issue. You know, I said, I want to make sure  
13 that, you know, that the organization was aware  
14 of the assignments that I'm being asked to work  
15 on so that I account for my time how it's  
16 supposed to be accounted for.

17 Think others had expressed that  
18 issue with her. And I believe it was the end of  
19 October, something around then, she was let go.

20 And that's my knowledge of -- I  
21 believe it was Halloween, Marnie Meyer escorted  
22 her out of the office while she was -- Tiffany  
23 was trying to pack up, take papers and, like,  
24 propriety information and Marnie was saying, no,

1 you can't take this.

2 Sorry, I don't know if I'm -- if I  
3 answered the question.

4 Q. You definitely answered the  
5 question.

6 So that's a good lead-in, though,  
7 because my next question, I want to shift gears  
8 and talk about Marnie, because Marnie has made  
9 allegations against the Forum. And that's why  
10 you're here this morning.

11 Did you and Marnie -- how do I  
12 phrase this?

13 Was Marnie at the Forum the  
14 entirety of the time that you were at the Forum  
15 or was she hired after you?

16 A. I believe she was hired the day  
17 before me. We started on the same day at the --  
18 the only office I ever worked in, I believe was,  
19 I started there the first day that everyone else  
20 did. And I think she said she had started the  
21 day before.

22 Q. And what was your working  
23 relationship like with Marnie?

24 A. In the beginning it was good.

1 We -- we joked around a lot. Our offices were  
2 right next to each other about -- for about three  
3 years, so we'd know, see each other coming and  
4 going.

5 We socialized outside of work.  
6 She invited me with her friend to happy hour at  
7 the -- at the bank that's now a restaurant on  
8 Market Street -- or Chestnut Street.

9 We had cocktails at a pizza place  
10 on, you know -- like we were friendly for a  
11 while. And I'm not sure when it was, but started  
12 to feel that maybe -- I don't know, that  
13 something was strange.

14 Q. What do you mean by that,  
15 something was strange?

16 A. She would ask, like, what is Eman  
17 working on, or what is so and so doing in their  
18 office?

19 And, you know, she was the finance  
20 and the HR. I forget what her title was exactly.  
21 But, you know, she wanted either more  
22 responsibility than she had or she got offended  
23 if I was asked to do something that she believed  
24 was on her -- her words were, came across her



1 desk.

2 But it wasn't until probably the  
3 final months of, I guess, before I resigned that,  
4 you know, she had asked me, do you think I could  
5 be Director of the Forum and, you know, questions  
6 along those lines.

7 And I started to get the feeling  
8 that maybe she wanted more responsibility or  
9 authority over the -- over the office.

10 Then at some point I believe I was  
11 asked to be, like, the point person to  
12 communicate with Daniel. She took issue with  
13 that. Not directly with me, which I was, you  
14 know, hurt by.

15 You know, if she had said, Matt, I  
16 think I'm the most qualified to run the office, I  
17 would have said, you know, please do.

18 But, you know, we started off  
19 well. My wife was -- my wife met her. I don't  
20 think she was ever a big fan, for whatever  
21 reasons.

22 So I guess it started off good and  
23 then it progressed downward over -- over time.

24 Q. I just want to clarify two things

1 you just mentioned in that answer.

2 So you made a comment that she  
3 said, do you think I could be director. But the  
4 way you phrased it, I'm unclear if she was asking  
5 you if you thought she could be director or if  
6 she was referring to herself?

7 A. I'm sorry. I don't understand  
8 your question.

9 Q. Let me ask it again.

10 So you -- you had just testified  
11 that you had a conversation with Marnie wherein  
12 she made a remark akin to, do you think I could  
13 be director.

14 And the way you just stated it in  
15 your answer, I was unclear if you had intended to  
16 mean that Marnie was referring to herself or that  
17 Marnie was referring to you, Matthew Bennett?

18 A. No. Do I think that she could be  
19 director.

20 Q. Okay.

21 A. And I don't remember what my  
22 response was. But I might have -- or I might  
23 have said, you know, no, because she didn't have  
24 any, I don't know, background or understanding of

1 Middle East foreign policy and things of that  
2 nature. But it was more administratively, that's  
3 how my knowledge of her skills, and, you know, as  
4 in finance and books and accounting, et cetera,  
5 and knowing what the director role involved,  
6 so -- but -- yeah. I don't remember when -- when  
7 she asked me that, but immediately I started  
8 to -- I don't know.

9 I would never ask somebody else,  
10 do you think I could be -- unless I wanted to be  
11 it, so...

12 Q. Was that -- I believe you said  
13 that was in the few months leading up to your  
14 separation from the Forum?

15 A. Yeah. It would have been  
16 unnatural if it came up before then.

17 Q. Okay. Then you also said that you  
18 found out that you were going to be a point  
19 person at the Forum and you felt that she had  
20 taken issue with that.

21 How do you know that she took  
22 issue with that? And how was it communicated to  
23 you?

24 A. It was never communicated to me.

1 But at the time, I was on very good terms with  
2 every single person at the office.

3 I asked them point blank. I asked  
4 Lisa, Tricia, Katrina, every single person. I  
5 said, did you have any issue with me being  
6 supervisor or manager or whatever?

7 And they said, of course not. And  
8 I said, you know, did -- like am I -- you know,  
9 what could have led to me being asked to do that?

10 And then, you know, I was -- I was  
11 on vacation in Jamaica and I was with my family.  
12 And I remember the day before I left, I think it  
13 was, I said, sure, I'll be point person.

14 And then on my last day in  
15 Jamaica, I was told that that was no longer the  
16 case.

17 So whatever transpired in that  
18 week while I was gone led to me, I guess, not  
19 being desired for that point person, whatever.

20 Q. So your opinion that Marnie had an  
21 issue with it was just because you had asked  
22 everybody else and they said that they did not  
23 have a problem with it?

24 A. Yeah, I think so.

1 I mean, at the time, things, I  
2 guess, were -- I mean, it's hard for me to  
3 pinpoint the exact time that I felt like my  
4 relationship with Marnie was, like,  
5 deteriorating.

6 But, you know, she would say  
7 things that -- like I would socialize with, like,  
8 Lisa and Tricia. We would go out, you know, to  
9 happy hours and drinking until 2, 3:00 in the  
10 morning, and -- all the time.

11 One day Marnie said, well, they  
12 don't really like it if you -- when you go with  
13 them, because they want -- they're trying to pick  
14 up guys and it's harder to do that when you're  
15 with them.

16 I said, oh, they never told me  
17 that. I'm not trying to, like, force myself into  
18 a happy hour with people for no reason.

19 And I asked Tricia, I said, you  
20 could have just told me one day that, you know,  
21 you wanted to whatever. And she said, I can't  
22 believe Marnie said that to you.

23 And, you know, I remember thinking  
24 or saying, like, you can't believe it because she

1 made it up? Or you can't believe it because you  
2 can't believe she told me?

3 And the response that, I believe,  
4 she gave was, I can't believe she made it up.

5 So I saw that she was drive a  
6 wedge or I felt that she was trying to drive a  
7 wedge between myself and the rest of the people  
8 in the office.

9 And that -- I didn't at the time  
10 maybe see the full picture. But sitting here  
11 today, I could tell you other things I think  
12 might be indicative of that -- of her efforts to  
13 do that from my perspective.

14 Q. You supervised or were -- Lisa --  
15 let me ask the question this way.

16 Lisa and Tricia were your  
17 subordinates, correct?

18 A. No, Lisa was not my subordinate.

19 Q. Tricia was your subordinate?

20 A. Yes, one of them.

21 Q. And how would you, in terms of the  
22 hierarchy of the office, where would Lisa fall in  
23 if she was not your subordinate?

24 A. She was originally hired, I

1 believe, as an executive assistant or executive  
2 liaison. I'm not sure what the role was. But it  
3 was providing assistance to current director.

4 Lisa, I believe, she -- at some  
5 point she started taking on  
6 communications-related work, like marketing-type,  
7 I guess, activities that was never under the  
8 development role when Tiffany was managing the  
9 development team or when I was.

10 It was strictly fundraising --  
11 fundraising, you know, activities online,  
12 fundraising related travel physically.

13 So the work that she did, we  
14 needed to like coordinate, but she never sent,  
15 like, her weekly reports to me, for example.

16 Q. And Marnie was HR, correct?

17 A. Yeah, I believe. She had, like, a  
18 dual title of finance and HR, yes. Director of  
19 Finance and something like that.

20 Q. Did it ever occur to you that  
21 Marnie was telling you not to go out with the  
22 other women because it put you in a compromising  
23 position?

24 A. No. She could have told me that

1 directly. I mean, Marnie was inviting me to  
2 happy hours herself with her friend.

3 I remember sitting at the bar and  
4 they were, you know, trying to -- like talking to  
5 guys.

6 Several times I had gone out with  
7 Marnie and, I mean, -- why wouldn't she just say  
8 that to me directly?

9 Q. Were you done with your answer?  
10 You said um at the end and I wanted to make sure  
11 I wasn't interrupting.

12 A. Yes, so that's -- well, to answer  
13 your question, that never occurred to me.

14 If that was the case, she said  
15 much more direct things to me than that, so I  
16 believe she would have said it.

17 Q. Okay. You mentioned that you felt  
18 she was trying to drive a wedge in between you  
19 and the other office staff and you had many more  
20 examples of that.

21 Can you give me the examples that  
22 you recall?

23 A. I believe -- I think the time came  
24 for annual reviews or something along those



1 lines, or it was like end of year, maybe 2018, I  
2 was pushing to give everybody raises, promotions.

3 And that if I took on the director  
4 role, was advocating for Tricia to take on my  
5 role as Director of Development.

6 Marnie said Tricia was a follower.  
7 She didn't deserve it. Delaney -- she would tell  
8 me, what's she doing in her office? You know,  
9 same thing with Eman. What's Eman doing in her  
10 office all this time?

11 So I would have to, like, -- she  
12 would say it to me or sometimes me and Gregg  
13 together, and then I would, you know, get more on  
14 top of subordinates, as you called them, and I  
15 think it was obvious to them that my -- that  
16 wasn't my management style. It wasn't like the  
17 nature of my personality to be, like,  
18 aggressively timekeeping.

19 It was more of a -- you know, I  
20 respect your ability to do this. So, you know,  
21 if you execute on whatever timeframe and  
22 workplace you want to do it, deliver it at  
23 3:00 a.m., fine.

24 But, you know, if you want to sit

1 in the office and do something else for an hour,  
2 okay. I suddenly became like the clock watcher.  
3 And I think that was obvious to some of the  
4 people there.

5 At some point when we were  
6 receiving bonuses, she came in my office and told  
7 me what Daniel was going to receive and compared  
8 that to what I was going to receive and said,  
9 this is the man that you work for, that we work  
10 for. You know, look at this. Said worse things  
11 than that.

12 But trying to show me that, like,  
13 you have all this admiration for this guy and  
14 then this is his -- how he is going to compensate  
15 you after this year or what he thinks of your  
16 work product after this year.

17 In the time that -- you know,  
18 after the fallout with, I guess, with the meeting  
19 and with everything with Gregg, she would just  
20 say things like, just imagine -- just imagine,  
21 like, Gregg and one of the interns or, like, just  
22 he's a predator.

23 There wasn't one person that she  
24 had a good thing to say about. And then, you

1 know, eventually it became clear to me that I'm  
2 obviously not -- I'm not the only one that she's  
3 badmouthing, so that she's obviously badmouthing  
4 me to other people as well.

5 And like I said before, then I  
6 started to, I guess, see more full picture of  
7 what I thought was Marnie's, you know, nature.

8 Q. Is that everything you can recall  
9 in terms of her trying to drive a wedge between  
10 you and the rest of the staff?

11 A. There were -- I mean, when you say  
12 rest of the staff, do you mean the staff that  
13 were there at the time that I left? Or in  
14 general when there were, you know, everybody was  
15 there?

16 Q. Well, I'll let you answer that  
17 question, because you had testified that you  
18 thought Marnie was trying to drive a wedge  
19 between you and the rest of the staff.

20 So I'm just following up on that.  
21 So --

22 A. All right. Well, I mean, as far  
23 as driving a wedge, I mean, it was a very -- it  
24 was, like, a casual relationship we all had. We

1 were friends. We all went out to happy hour. We  
2 were socializing.

3 She talked about guys she was  
4 dating. I think she wanted to date the Jewish  
5 guy. I tried setting her up with my friend.  
6 Messaged him on Facebook. You know, I sent him  
7 Marnie's profile. Said he wasn't interested.

8 She talked about, I guess, an  
9 African-American guy she was dating. And then  
10 Lisa threw it back in her face one day and said  
11 Marnie was -- I don't want to be explicit, but --

12 Q. You can be explicit.

13 A. Marnie's out sucking big black  
14 cocks. And, I mean, they had issues between  
15 them, I guess, as both two Alpha females became,  
16 like, explosive.

17 Q. Are you saying Lisa said that  
18 about Marnie, to be clear?

19 A. Yes. She yelled it in the middle  
20 of the office. I don't know if Marnie was there  
21 that day or whatever, but -- I think Lisa felt at  
22 some point Marnie was, like, watching her.

23 And then there was this  
24 closed-door meeting that she was unhappy about.

1 And that I had to figure out what was -- Lisa was  
2 meeting with another person about.

3 She yelled at me. She said,  
4 you've always had a big mouth and that's your  
5 problem. Or she screamed something like that in  
6 my face.

7 Q. Who screamed in your face?

8 A. Marnie.

9 Q. Okay. I wasn't sure if we were  
10 talking about Marnie or Lisa.

11 A. Yes. Sorry. She stormed out of  
12 the office.

13 I mean, whether or not she was  
14 doing it knowingly or unknowingly, you know, it  
15 definitely felt like her actions would diminish  
16 my relationship with staff -- or they weren't  
17 there to bolster or boost them.

18 And I believe that, you know, that  
19 is evident in her wanting to be the point person  
20 for the office. Her believing that she could be  
21 director. And her thinking that she was the most  
22 qualified or she worked the hardest or she was  
23 the person that should be or that deserved more  
24 roles and responsibilities, et cetera.

1                   So I remember a phone conversation  
2   that I had with her where, I believe -- where I  
3   was in the airport maybe on the way to Jamaica or  
4   something -- sometime around then when I said,  
5   when I get back, you know, I'm gonna motivate  
6   everybody and get them all -- everything to be  
7   inspired. I have big plans. Roll out Google for  
8   work or other things that I was thinking about.

9                   And I remember her reaction to  
10   that just being on the other side of the phone,  
11   like, she -- she could have cared less. Like she  
12   wasn't caring about motivate -- like it was --  
13   there was something else that was eating her and  
14   now I see that it was that. She wasn't asked to  
15   be point person.

16                  Q.       Is that everything you can  
17   remember with regard to Marnie trying to drive a  
18   wedge between you and the rest of the staff?

19                  A.       There was two other females that  
20   worked there, Lara and Laura. They walked in  
21   the -- the pink -- the pink hat -- I forget the  
22   'Me, Too' -- like the pink hat -- there was a  
23   March in D.C.

24                   And they tell me Lara and Laura

1 are like these pink hat people and they -- you  
2 know, they're 'Me, Too' women or something along  
3 those lines.

4 But, yeah, with those two people  
5 also, like, Laura isn't -- she was constantly  
6 pointing people a finger at other people doing  
7 their jobs. Saying this one can't do their job,  
8 this one can't do their job, this one can't do  
9 their job.

10 Q. Laura was doing that or Marnie  
11 was? I'm sorry.

12 A. Marnie was. And I'm just saying  
13 Lara and Laura were two people -- like Lara I saw  
14 it in, because Lara was Gregg's assistant and she  
15 couldn't fulfill that role.

16 So when we had an intern that  
17 Marnie recommended for the job, Katrina --  
18 Katrina was able to help schedule meetings and  
19 organize travel, whereas, Lara, with a Master's  
20 degree and a background, you know, in foreign  
21 policy or international relations, was unable to  
22 do that.

23 So that was the person, like  
24 Tiffany, that sort of I was -- I had firsthand

1 knowledge, right, they're not able to execute the  
2 roles of their position.

3 But, you know others, it would be  
4 Marnie sort of bringing it to my attention.

5 Q. So I don't -- I don't want to  
6 interrupt you with your answer.

7 But I guess I'm just a little  
8 confused with the conversation about Lara and  
9 Laura, how that plays into the question of what  
10 Marnie did to drive a wedge between you and the  
11 staff?

12 A. Well, Laura, I started -- once I  
13 started to scrutinize, I guess, her work more  
14 carefully, I saw the newsletter she was  
15 preparing. There were, like, spelling mistakes  
16 and Daniel would be -- you know, to misspell the  
17 name of a university, like, it's embarrassing for  
18 think tank.

19 And, you know, it's true. I mean,  
20 it was.

21 You know, just I would -- I'm not  
22 like the type to aggressively be managing people.  
23 I'm more, like, lead by example and inspiration.  
24 And she was the opposite approach.



1                   It was, like, what time did you  
2 get here? What did you do for four hours? You  
3 know, like just a different mentality.

4                   So in either telling me directly  
5 that I had to be on top of people in the way that  
6 she was or, you know, saying it to Gregg so that  
7 Gregg would tell me, you know, you need to better  
8 account for people's time. You know, it was  
9 coming from Marnie.

10                  Like I would know that Gregg and  
11 Daniel weren't in the office and all of a sudden  
12 Gregg's telling, that's because Marnie told him,  
13 Eman was in her office with the door closed and  
14 now Gregg's telling me you need to account for  
15 Eman's time better.

16                  I mean, it's evident to me what  
17 happened. She went to Gregg and she told, Eman's  
18 not doing whatever -- she had an issue with  
19 him -- like she had an issue with her.

20                  She was like -- I don't know. She  
21 was like Draconian in her oversight. She was  
22 very, like, aggressive in, like, this management,  
23 you know, style.

24                  And it was just -- it was the

1 opposite of what I -- of my personality.

2 So together as friends, she would  
3 be very cordial with me. We would joke. Tell me  
4 about her son. He had a smoking problem. Or  
5 people she was dating or what her daughter did  
6 or, you know, things in her personal life.

7 But then when it came to work, it  
8 was, like, -- you know, a different person.

9 And that, you know, person, I  
10 guess, was -- I would just sort of ignore that,  
11 because I had all of the social and  
12 inter-personal stuff with her.

13 But, you know, I think in the end,  
14 that contributed a lot to, you know,  
15 deteriorating relations between staff.

16 Q. So is that everything you can  
17 think of with regard to Marnie putting a wedge  
18 between you and your staff?

19 A. I believe so. Lara, Laura, Eman,  
20 Tricia, Lisa, Katrina, Delaney. Maybe Thelma,  
21 also.

22 I think -- I remember one day they  
23 had an argument or a fight or something and then  
24 I think Marnie was making the case that Thelma

1 needed to go, that she was there for a while and  
2 she's past her time. Something like that.

3 But, you know, I'm pretty sure  
4 that's all -- oh, there was then Judy.

5 Judy said there wasn't enough  
6 Hanukkah decorations and she wanted more. Like  
7 they decorated the office for Christmas and she  
8 thought, you know, it should be equal or there  
9 should be multi-denominational, you know,  
10 decorations or whatever.

11 Then it was something with Judy.  
12 Look, I don't recall that that's her  
13 responsibility to find fault as an HR person.  
14 That would be every single person.

15 But if I start going back in my  
16 mind, I can think of issues that she took with  
17 every single person for the most part.

18 Q. So I don't need you to do that,  
19 because the question that's in front of you right  
20 now is how Marnie specifically --

21 A. I understand now --

22 Q. -- drove a stake between you and  
23 your employees.

24 So is -- have you -- do you feel

1 like you have listed everything you can think of  
2 with regard to that specific inquiry?

3 A. Yes.

4 Q. Okay. You mentioned in -- well,  
5 first of all, let me ask you this.

6 So you said that Marnie had wanted  
7 you to keep a better handle on what Eman was  
8 doing in her office and that she wanted you to  
9 hold Lara and Laura accountable for the quality  
10 of their work, correct?

11 A. No. She never came in and said,  
12 like, Laura needs to do better work.

13 She never came in and said, like,  
14 Lara's not doing a good job.

15 Like Lara and Laura just happened  
16 to become friends, because they were hired at the  
17 same time. So they were eating lunch together,  
18 they were in each other's offices. They were,  
19 you know, whatever.

20 She seemed to like that, them  
21 being, like, buddy, buddy.

22 Eman -- I think Marnie went on  
23 Twitter and found that, you know, she was  
24 tweeting during work and said, like, look, this

1 is what she's doing in her office with the door  
2 closed. Like she's on Twitter, she's not doing  
3 work.

4 So she's never telling me, like,  
5 you need to keep better time or, you know, with  
6 anybody.

7 But it was mostly, like, look --  
8 you know, like what are they doing? Or just  
9 expressing doubt about their -- what they were --  
10 how they were using their time.

11 Q. Well, you mentioned that the  
12 newsletters did have misspellings that Dr. Pipes  
13 was unhappy with, correct?

14 A. I mean, I know -- yeah, there were  
15 misspellings in some of the newsletters, yeah.

16 Q. So in terms of somebody tweeting  
17 during work or putting misspellings into work  
18 products that circulated, her concerns about the  
19 quality of their work and how they were spending  
20 their time were well-founded, correct?

21 A. Well, I guess that's debatable.  
22 If they were founded, they should have been put  
23 into writing. Any time there was formal issue  
24 with an employee, you know, if there was

1 something that happened, I would -- you know, I  
2 knew I had to put it into writing and so that  
3 there was a clear record for obvious purposes.

4 But if it was just her coming to  
5 me saying something, like asking me to be the  
6 intermediary, which I'm not HR, and I  
7 shouldn't -- you know, even though Eman was under  
8 me, you know, if there was an issue, she could  
9 have said or held a meeting with me and Gregg or  
10 something along those lines, or Laura, to say,  
11 you know, I'd like to talk about, I don't know,  
12 the work that Laura's doing or -- I mean, in  
13 answer to your -- like, in answer to your  
14 question, it was -- no, we did -- we did have  
15 weekly meetings.

16 Like there was always a weekly  
17 team meeting with everyone. And then several  
18 occasions Marnie, Gregg and I would, like, go to  
19 lunch, like an Indian restaurant, I think it was  
20 an Indian buffet on Chestnut Street or something  
21 like that, and talk about, you know, these  
22 things.

23 So, I mean, this is a long time  
24 ago. It's hard for me to remember 2017 at this

1 point. Or what was going on in early 2017, which  
2 is when the Lara, Laura, Eman stuff, I believe,  
3 was going on.

4 Q. So would it be fair to say that  
5 you were the supervisor for those individuals  
6 that Marnie was coming forward to talk to you  
7 about their work performance or what they were  
8 doing in their offices?

9 A. I'm sorry. What was the question?  
10 Is it fair to say?

11 Q. That you were the supervisor of  
12 Eman or Lara or Laura?

13 A. Yeah. For a time I was Eman's  
14 supervisor. Then she was promoted to maybe  
15 Acting Communications Manager. So then I no  
16 longer needed to supervise her.

17 I never supervised Laura. She was  
18 the Communications Director. And Lara was  
19 Gregg's assistant.

20 So actually, no, those three  
21 people I never -- I didn't supervise them at all.

22 The only people who sent me weekly  
23 reports were Rosiebell, Thelma, Tricia and Eman,  
24 when she was in that role. But then, like I

1 said, she was promoted and then was no longer  
2 reporting to me.

3 Q. Okay. You had mentioned in your  
4 prior answer that Lisa made a remark that Marnie  
5 sucks big black cock. I know.

6 A. I'm sorry.

7 Q. I know it's funny to hear me  
8 repeat it. I get it.

9 Was Lisa ever disciplined for  
10 making that remark out in the open as you  
11 described it?

12 A. I don't -- I don't know. I mean,  
13 I don't -- I wasn't, like, her disciplinary -- it  
14 wasn't my --

15 Q. I don't know is an acceptable  
16 answer to any of the questions I ask you.

17 So if I ask you if she was  
18 disciplined, I don't want you to feel like you  
19 have to search for a better answer. If you don't  
20 know, I don't know is an acceptable answer.

21 A. All right. I mean, so no, that  
22 specific one, I don't know. I know -- I think --  
23 almost certain she was reprimanded for other  
24 things she said.



1                   That particular one, I think,  
2                   was -- no, because no one was there, except  
3                   probably myself -- I would be, like, the highest,  
4                   I guess, ranking person other than -- I don't  
5                   think she said it in front of Marnie and I didn't  
6                   tell anybody that she was yelling that, but --  
7                   Marnie had an issue with Lisa's language. I  
8                   think she was, like, vulgar. She was, like,  
9                   loud.

10                   And I believe that they talked --  
11                   they had to talk to her about that. But not that  
12                   specific comment.

13                   Q.       Did Lisa ever make any other  
14                   comments about Marnie's sex life out in the open  
15                   when they were arguing?

16                   A.       Other than that one, yeah, that  
17                   she -- I can't remember the words, but saying  
18                   that, yes, she had, like, I guess, -- maybe had  
19                   gotten laid the night before or something, so she  
20                   was, like, talking to, I guess, Lisa or them  
21                   about it.

22                   And then I don't remember the  
23                   exact words, but like feeling good or something  
24                   or that she had a good night or whatever.

1 And then, you know, would talk  
2 about it. I mean, she talked -- like, she wasn't  
3 shy to talk about if she was dating someone or if  
4 there was someone -- or, you know, what was going  
5 on in her personal life with me and the other  
6 women in the office.

7 Maybe she was more explicit about  
8 it, about the details with the other women. But  
9 then it came back, like, you know, the  
10 comments in -- by Lisa were, you know, -- if that  
11 makes sense.

12 So it was, like, you know, she  
13 might share it with me. I'm not gonna go blurt  
14 it out. But she might have shared things with  
15 Lisa and then Lisa blurted it out.

16 I can't -- I'm trying to think of  
17 specific examples, but that's the best I can do.

18 Q. If Lisa or anybody else spoke  
19 about that out in the office when they were  
20 actually at work during work hours, so not at a  
21 happy hour, but at work, was she ever disciplined  
22 or told not to speak like that in the workplace?

23 A. Who, Lisa or Marnie?

24 Q. Lisa.

1           A.       Lisa. I mean, I feel like I  
2 remember saying, you know, you need to tone it  
3 down. Like, you know, -- like, Thelma has been  
4 there, like, 30 years or however many years. And  
5 she's, you know, older -- I mean, she's on the  
6 other side of the office but it could still be  
7 heard.

8                   And there were young -- you know,  
9 young girls we had just hired, either interns.  
10 You know, if Katrina was still an intern or  
11 whatever.

12                   So I remember -- you know, that  
13 atmosphere never existed at MEF until -- in the  
14 beginning. It was always, you know, be very  
15 careful about what you say in the office.

16                   And then it changed, you know,  
17 over time when Marnie and Lisa started talking  
18 about, like, male escapades or their personal  
19 stuff.

20                   You know, I think that's -- that  
21 led to the -- I don't know, deterioration. It  
22 was -- like everybody knew not to do it in front  
23 of Gregg. Like, because it -- Gregg is acting  
24 director or, you know, director, acting

1 supervisor over everyone in the office.

2 Even if I or Gary or someone else  
3 made, like, you know, a borderline comment, like,  
4 we would get chewed out for it. Like, it's not  
5 appropriate in the workplace, whatever.

6 And we had a sexual harassment  
7 training or workshop. We had a security  
8 workshop. Whatever.

9 As soon as Gregg was out of the  
10 picture, it was, like, you know, you could say  
11 whatever -- I don't know, say whatever you want.  
12 Like Matt's not going to be the one to come down  
13 with an iron fist and reprimand us.

14 And with all fairness, you know,  
15 that was the thought. And it was probably right.  
16 I was not -- I was not putting everybody on,  
17 like, lockdown.

18 But I can see now, in hindsight,  
19 obviously needed, you know, in that type of  
20 environment, when you're dealing with these types  
21 of personalities.

22 Q. So do you feel that the -- that  
23 the environment at MEF, that the conversations  
24 became more about sex and more vulgar after

1 Mr. Roman's departure from the office?

2 A. I'd have to say yes. I don't  
3 remember anybody else ever talking about their  
4 like sex life, so to speak, other than -- other  
5 than Marnie.

6 I could go through them, obviously  
7 not -- not Thelma, not Lara and Laura. Certainly  
8 not Eman. Certainly not Judy.

9 The only open relationship on the  
10 table was Marnie. Then Lisa and Tricia come on  
11 board, and Katrina and Delaney. Things, I guess,  
12 loosened up.

13 I mean, we felt like we were  
14 creating like a real, you know, cohesive team of,  
15 you know, capable, qualified people that, you  
16 know, we were happy to socialize with outside of  
17 work.

18 So, you know, I guess people let  
19 their roles down -- or let their guard down so to  
20 speak and became more free speaking.

21 But, yeah, definitely after, I  
22 guess, you know, Gregg left. I mean, I never  
23 thought about it like that but, yeah.

24 Q. So you talked a lot about your

1 relationship with Marnie and you mentioned  
2 several times that you would go out for happy  
3 hour and drinks and socialize with Lisa Barbounis  
4 and Patricia McNulty.

5 On those occasions, was Marnie  
6 present?

7 A. Some of them.

8 Q. Okay.

9 A. I mean, I would say, like,  
10 50 percent.

11 Q. Would you classify yourself, prior  
12 to your separation from MEF, as having been  
13 closer with Lisa and Patricia than with Marnie?

14 A. Would I -- I'm sorry. Say it  
15 again?

16 Q. Yeah.

17 Would you say that you were closer  
18 with Lisa and Patricia than you were with Marnie  
19 prior to your separation from MEF?

20 A. Like you mean on the day that I  
21 resigned, what was the status of my relationships  
22 with them?

23 Q. No.

24 I'm asking you -- I'm trying to

1 get -- to limit it in space and time for you only  
2 but I'm just asking you in generally if you felt  
3 closer with Lisa and Patricia than you did with  
4 Marnie?

5 A. Oh, yeah. Over time, I started,  
6 you know, feeling much closer with Lisa and  
7 Tricia, I guess. But it was never, like, -- I  
8 mean, it was only after I believed that Marnie  
9 was, like, trying to undermine me in the office.

10 So, I mean, I guess, like -- like  
11 it varied. Obviously Marnie was the closest  
12 person that I had on, you know, the -- since the  
13 beginning, since my time there.

14 And then after Gregg left and I  
15 was named point person -- so from 2016 to end of  
16 2018, I was, you know, obviously closer to  
17 Marnie.

18 Then something happened while I  
19 was in Jamaica. I feel like she had it out for  
20 me. And, you know, naturally my natural response  
21 would probably have been to detract from her and,  
22 you know, become closer with Lisa and Tricia.

23 I mean, I can't prove that she  
24 wanted me -- to have me fired. But I would -- if

1 I had to guess today, I would say that the same  
2 way she did with it -- like started doing it with  
3 every other person, Gary, Eman. Like, I believe  
4 she would have done it with me, too.

5 I have no reason to believe she  
6 would not have done it with me, based on watching  
7 her interactions with those people. It always,  
8 like, jovial and, you know, good -- good  
9 relationships, just like me.

10 And then but behind the scenes  
11 was, well, look at Gary, look at Eman, look at  
12 Lisa. She called Lisa a cancer that needed to be  
13 removed.

14 But, you know, I can't pinpoint  
15 and answer your question how often, if it was all  
16 of us together. But, you know, when it was, it  
17 would be, you know, we were -- it was, like, our  
18 work hats were off.

19 You know, if Lisa was talking  
20 about her relationship or her marriage or a guy  
21 that Tricia was dating that I knew or met on  
22 Bumble that I knew or whatever it was, that  
23 Marnie was looking to -- for a relationship or  
24 her ex-husband or whatever, that she would tell



1 me about, it was all in the open.

2 Like, it was -- it's hard to say,  
3 like, who I was closer with. It was just not  
4 thinking about it, you know, in those terms.

5 But knowing me, as soon as I got  
6 the feeling that she was probably not as genuine  
7 as I thought she was, I would have veered to, you  
8 know, other people.

9 I was going through a difficult --  
10 I had lost a baby. It was, like, rough with my  
11 wife. So I really felt, like, my co-workers were  
12 all like my family. They were colleagues,  
13 friends and family.

14 When we got pregnant, like, those  
15 were the people that I told that Holly was  
16 pregnant. And when we lost the baby, those were  
17 the first people we told that we lost the baby.

18 You know, not even my -- you know,  
19 my closest friends and family from childhood. It  
20 was them. Because we spent all day together in  
21 the office, we socialized in the evening.

22 Q. Okay. So I will always let you  
23 finish your answers to my questions, but -- we  
24 will get through this faster if you just listen

1 to the question that I'm asking and try to stick  
2 to that.

3 A. I'm sorry.

4 Q. I'm not going to interrupt you  
5 when I just -- when I promised you I'll go fast,  
6 you are sort of the beholder of your own destiny.  
7 There for the time -- I'll leave that with you.

8 A. All right. I'll try to make --

9 Q. I'll leave that with you.

10 A. All right.

11 Q. With regard to the work  
12 environment at MEF, you have described that, you  
13 know, there was some tension between Marnie and  
14 Lisa, at least.

15 Can you describe sort of what the  
16 everyday work environment at MEF was like?

17 A. All right. So I'm gonna try not  
18 to go on forever.

19 But was -- everybody mostly  
20 arrived to the office around 9 a.m. And, you  
21 know, on days that there were guests or meetings,  
22 Daniel was going to be meeting with a donor or  
23 Gregg -- if we had vendors in, you know,  
24 everybody would be dressed up, suit and tie, like

1 business professional.

2 On days that that was not the case  
3 we'd be in business casual or just casual.

4 You know, everybody had the  
5 privacy of their own offices, the doors and they  
6 had their own desk.

7 For lunch, you know, sometimes,  
8 you know, everybody would go out to lunch  
9 together or bring back food from the -- you know,  
10 restaurant and eat in the conference room.

11 And I don't know, that's the -- I  
12 don't know what type of, you know, information  
13 you're looking for, but --

14 Q. So, you know, you had mentioned  
15 that Lisa and Marnie sometimes would get into it  
16 in the office.

17 Was there anybody else who had  
18 tensions in the office or would you say it was  
19 only Lisa and Marnie?

20 MS. DiBANCA: Erica, may I  
21 interrupt to ask, do you want to give him  
22 a date range?

23 MS. SHIKUNOV: Sure. You know  
24 what, we can --

1 THE DEPONENT: Yeah, that's --  
2 BY MS. SHIKUNOV:

3 Q. Let's divide that up. Let's  
4 divide that up.

5 So I am going -- for most of our  
6 depositions, we sort of talked about the work  
7 situation pre-November 1st, 2018, and then  
8 post-November 1st, 2018.

9 So I'm going to ask you the same  
10 question twice with those date ranges in mind.

11 So first I'm going to ask you,  
12 other thing than between Lisa and Marnie, prior  
13 to November 1st of 2018, whether tensions with  
14 anybody else -- amongst anybody else in the  
15 office that you were aware of?

16 And I'm not asking you to talk  
17 about something you're not aware of. So don't  
18 guess. Just tell me what you personally were  
19 aware of.

20 A. Yeah. I mean, I just got to think  
21 about it for a minute, like go through my head of  
22 who's there when I was hired.

23 MS. DiBANCA: Erica, do you want  
24 him to go back to when he was hired or

1 just during Ms. O'Brien's employment?

2 That's fine.

3 Well, they started together.

4 MS. SHIKUNOV: Okay. I'm trying.

5 THE DEPONENT: All right. So

6 we're pre-November 1st. It would be --

7 the first one would be Marnie and Tiffany

8 Lee. And then Marnie and Lara. Then

9 Marnie and Stacy.

10 BY MS. SHIKUNOV:

11 Q. Stacy Roman?

12 A. And Gary. Sorry. I think there  
13 was something with Gary, yes.

14 Stacy Roman, yeah. And something  
15 with Gary.

16 So those -- who else was there  
17 when I started? Oh, Rosie. Maybe Rosiebell  
18 Maria. But that was, like, in the very  
19 beginning. I can't remember what that was about.

20 Q. Okay. And are you, when you're,  
21 like, wracking your brain and thinking these  
22 things through, are you recalling specific  
23 incidents where there was tension in the office?  
24 Or are you recalling that there was just overall

1 breakdown in the relationship between those  
2 individuals?

3 A. I believe with Tiffany it was --  
4 they were, like, -- or they were, like, -- it  
5 was, like, -- they wanted control -- it was,  
6 like, who was in control when Gregg's away? Was  
7 it Tiffany or was it Marnie?

8 And, you know, I was never in, I  
9 guess, any meeting or I wouldn't have been privy  
10 to that. But I could tell that that was an  
11 issue.

12 With Stacy, Marnie needed to  
13 reconcile -- Stacy managed Salesforce database.  
14 And Marnie managed the books. So there would  
15 have to be reconciliation, so they would have to  
16 meet regularly.

17 There was some issues that were --  
18 that they wouldn't be able to meet or that she  
19 wouldn't -- oh, that's right, before Stacy, it  
20 was Rosiebell. So Rosiebell was the database  
21 administrator before Stacy -- or had those  
22 responsibilities.

23 So Rosie would have to meet with  
24 Marnie. And then Stacy would have to meet with

1 Marnie. And they both seemed to have, I don't  
2 know, -- like, issues meeting with her.

3 I can't remember what that was  
4 exactly. Maybe -- I don't know --

5 Q. Don't guess. If you don't know --  
6 because I was just asking you if you recalled the  
7 nature of the complaints you were raising were  
8 with regard to specific incidents or generally.

9 And I literally just -- that was  
10 all the information that I was for asking.

11 A. Yeah. Okay. So Tiffany I told  
12 you.

13 I believe she said Gary was, like,  
14 dirty and he smelled. I'm sorry. But -- I think  
15 that was -- that and -- what was it Lara was --  
16 and Laura were inappropriately maybe dressed.  
17 Something like that. Weren't professionally --  
18 didn't have professional attire on when either  
19 for some event or maybe just in general in the  
20 office. I just remember it had something to do  
21 with clothes.

22 Yeah, that's right. Because Laura  
23 was an assistant, she handled reimbursements,  
24 something like that. Something about -- I don't

1 know, business expenses or on the MEF card,  
2 something like that.

3 Q. Okay. So what you're describing  
4 to me it sounds like there were issues regarding  
5 specific incidents. Is that a fair -- fair  
6 generalization?

7 A. I think so. But that's -- I mean,  
8 like, there's two answers.

9 There's my perspective at the time  
10 and what I believe now. So my perspective at the  
11 time, yes. What I believe now is no.

12 Q. Why do you think something  
13 different now?

14 A. Just looking at everything from  
15 30,000 feet, it seems like there's a pattern of  
16 taking issue with the way that it was gone about  
17 with various people. And, you know, -- well,  
18 they're not there anymore.

19 Those people don't work at the  
20 organization anymore. Gary, Eman, Larry [sic],  
21 Laura, Tiffany.

22 They all -- I think, Eman  
23 resigned. Maybe she got a better position  
24 elsewhere or she got to do Vegan restaurant



1 thing, whatever she wanted to.

2 But everybody else, I believe, was  
3 let go. And really the only people in the office  
4 who would have been able to see day-to-day.

5 Like, their work performance would  
6 have been myself and Marnie in, like, managerial  
7 position capacities.

8 It wasn't me who was, like, I  
9 don't know urging for anybody's termination or,  
10 like, seek -- or, you know, out for that.

11 Whatever.

12 Q. I'm sorry. I need to interrupt  
13 you for a second.

14 You said everybody was let go.  
15 Did you feel that Marnie was pushing to let  
16 people go who didn't desire to be fired?

17 A. I think she knew it was naturally  
18 better finance-wise that there was less people on  
19 payroll meant more responsibility for the people  
20 who are in the organization or remain in the  
21 organization.

22 I mean, I can't say, yes, Marnie  
23 wanted to fire people, but, I mean --

24 Q. Well, you just did testify to

1 that. And my question to you is, if you felt  
2 that Marnie was pushing to fire people, do you  
3 feel she was pushing to fire people who didn't  
4 deserve to be fired?

5 Put another way, do you think MEF  
6 fired somebody who didn't desire to be fired?

7 A. No. I mean, everybody who was let  
8 go had good -- while I was there that I saw had  
9 good reason.

10 Q. Okay.

11 A. You know, when it came time to  
12 talk about their work performance, like, yes, I  
13 would say, like, all right, I don't think Tiffany  
14 knows what she's doing with the sales for force  
15 database migration.

16 And Lara is not able to schedule  
17 all the travel and the meetings.

18 And, you know, Eman could be  
19 making better use of her time. And Laura --  
20 Laura would bring more to the table as a  
21 Communications Director with the background and  
22 qualifications that she had.

23 So it's, like, -- it was, like,  
24 the issues were dropped in, like, engineered and

1 then eventually in the future, like, well, Matt,  
2 what do you think about Lara's performance? What  
3 do you think about, you know, this person, you  
4 know, in general?

5 And then I'd have to think about  
6 it and do, like, a serious assessment, make sure,  
7 you know, I'm being diligent or -- you know,  
8 what's in the best interests of the organization  
9 to fulfill its mission.

10 But balance that with -- you know,  
11 with fairness to, you know, the people.

12 So I always tried to do that.

13 Q. So, Mr. Bennett, I'm going to ask  
14 you another question now.

15 But I just want to draw you to the  
16 attention fact that I asked you simply if MEF  
17 ever fired somebody that didn't desire to be  
18 fired, and we got probably three or four minutes  
19 of response back to a yes or no question.

20 So I'm gonna let you finish --

21 A. No. All right. Thank you for  
22 pointing it out.

23 Q. I'm just pointing out to you that  
24 I can only help you so much in terms of getting

1 out of here quickly.

2 A. I understand. My answer is no.

3 Q. Okay. So I'm going to ask you  
4 that question about tensions or workplace  
5 interactions post-November 1st, 2018, through  
6 your separation in early 2019.

7 A. So the question -- sorry. Just  
8 repeat it one more time.

9 Q. Sure.

10 You had mentioned that there were  
11 workplace tensions between Lisa and Marnie.

12 Were there any other tensions in  
13 the MEF workplace between November 1st, 2018, and  
14 your separation, I believe, at the end of  
15 February 2019?

16 So we're talking about a four- or  
17 five-month period.

18 A. Yeah, I believe all of the girls  
19 were -- I mean, it was obvious to Stacy that it  
20 was not going to be a comfortable work  
21 environment for her. But if she went remote,  
22 meaning she continued working, but, like, from  
23 obviously remote working -- everybody knows what  
24 that is now. So there was that.

1 Not that I could think of. I  
2 mean, Marnie would say to me behind the scenes  
3 about Tricia, but I don't think she ever said  
4 anything -- maybe, I don't know, with Tricia and  
5 Marnie.

6 Definitely with Lisa and Marnie.  
7 I think the thing with Thelma was before  
8 November 2018.

9 Yeah, I think that was -- I think  
10 that's -- I mean, I don't think there would be  
11 anybody else.

12 I mean, as far as, like, the  
13 people in the office, there was maybe something  
14 with, I don't know, remote people. Like what is  
15 people that worked in DC or around the world or  
16 wherever. Like we're paying them this money and  
17 what are they doing with their time? That was,  
18 like, constant.

19 You know, like does this one  
20 deserve them what we were paying them? They were  
21 asked to go to the office -- you know, they sit  
22 at home or whatever.

23 I think -- I believe that that's  
24 it.

1 Q. I also believe --

2 A. It was like Game of Thrones.

3 Marnie was the referee or something like that.

4 Survivor. Or whatever.

5 Q. You felt like the work environment  
6 was like Game of Thrones or Survivor?

7 MS. DiBANCA: I'm just going to  
8 object to the form of the question. You  
9 can answer.

10 (Reporter read back last  
11 question.)

12 MS. DiBANCA: And then I put my  
13 objection on the record.

14 THE DEPONENT: Yeah. So, I mean,  
15 we're talking about, like, the way  
16 that -- I don't know, I felt that Marnie  
17 made it feel. Or, like, that -- you  
18 know, from the issues with employees.

19 Like, yeah, that was -- yeah, I  
20 guess that's how it felt. Not in the  
21 beginning, but yeah, that's how it felt  
22 after November 2018.

23 BY MS. SHIKUNOV:

24 Q. Okay. I am gonna move on from

1 this line of questioning. And I'd like to take  
2 just, like, a two- to five-minute comfort break  
3 really quickly. And then we'll come back on the  
4 record.

5 MS. DiBANCA: Yep. Perfect.

6 MS. SHIKUNOV: You okay with that?

7 So why don't we come back at, like, --  
8 it's 10:13, so I don't know, 10:18 feels  
9 like a weird time to come back. But  
10 that's five minutes.

11 THE DEPONENT: All right. Fine.

12 So do I stay -- should I log out and come  
13 back in?

14 MS. SHIKUNOV: No. Stay logged  
15 in. If you want to mute yourself or turn  
16 off your camera, that's perfectly fine.  
17 But I would definitely don't disconnect  
18 the call.

19 THE DEPONENT: Okay.

20 MS. DiBANCA: Just turn off the  
21 video and audio.

22 THE VIDEOGRAPHER: Off the record  
23 at 10:13.

24 (Recess.)

1 THE VIDEOGRAPHER: On the record,  
2 the time is 10:25 a.m.

3 BY MS. SHIKUNOV:

4 Q. Okay. So I'd like to shift gears  
5 from talking about the general environment at MEF  
6 and talk about some of the specifics of this  
7 case.

8 So I want to talk to you sort of  
9 the timeline of events as they transpire and get  
10 your recollections about what happened.

11 So it's my understanding that on  
12 October 30th, 2018, Lisa Barbounis and Marnie  
13 O'Brien had a pretty explosive argument in the  
14 office.

15 Do you recall that day, if that  
16 was --

17 A. I believe I wrote a report about  
18 it, yeah.

19 Q. Can you tell me as you sit here  
20 now what specifically you recall about that day?

21 A. October -- so I was on my way into  
22 the office, I think. But before I got there, I  
23 was -- Marnie told me there was a closed-door  
24 meeting going on. What's it about? I didn't



1 know.

2 I got to the office. I hadn't had  
3 coffee or anything yet and I think I went to see  
4 what it was about. And maybe because it was kind  
5 of awkward of me to interrupt a meeting to say,  
6 like, hey, what are you guys working on or  
7 whatever or something.

8 And I believe Marnie told me there  
9 was a closed-door meeting. So I came to see what  
10 it was about.

11 Later on I went to the bathroom.  
12 I came back from the bathroom. They were  
13 shouting -- Marnie and Lisa were shouting at each  
14 other.

15 She was -- she told me I had a big  
16 mouth because I repeated something that she had  
17 said.

18 Q. Who is she?

19 A. Marnie. If this is the day that  
20 I'm thinking of. I don't remember exactly what  
21 they were screaming. I wrote it down -- I mean,  
22 I'm pretty sure I wrote it down. But there  
23 was -- she left the office, slammed the door.  
24 And obviously everybody could hear it or whatever

1 was -- you know, whatever transpired.

2 Yeah, I'm pretty sure that was it.  
3 It was a closed-door meeting in Lisa's office. I  
4 came in trying to figure out what was going on.

5 I think I told Marnie whatever it  
6 was. I think Lisa got the feeling that I was,  
7 like, you know, like, hey, what are you doing?  
8 Which is unnatural for me -- I'm not -- for me to  
9 do stuff like that or what's the meeting about.

10 Yeah. And then I came back from  
11 the bathroom, they're yelling at each other.  
12 Marnie storms out of the office.

13 Q. Okay. And then it's my  
14 understanding that they had some sort of coffee  
15 or bench meeting on October 31st, the very next  
16 day, to work it out.

17 Do you have any knowledge about  
18 that? And, again, I would remind you that if you  
19 don't, that is also a satisfactory answer.

20 A. I don't know if that's the meeting  
21 to work it out. But there was one morning where  
22 I was in an Uber on the way to work.

23 I get a message from one of them  
24 that said, can you meet at Starbucks?

1 Q. We're gonna talk about that in a  
2 minute. Right now we're talking about the 31st.

3 A. Yeah, I don't even know what that  
4 is --

5 Q. Okay. And that's a perfectly fine  
6 answer.

7 So the next day, November 1, 2018,  
8 Marnie presented Dr. Pipes with a handwritten  
9 report containing sexual harassment allegations  
10 about Mr. Roman, as well as other complaints  
11 about Mr. Roman's management.

12 Did you ever meet or discuss that  
13 report with Marnie, Lisa or anyone else?

14 A. Yeah, that's what I was saying  
15 before.

16 Q. Okay.

17 A. Was that on -- I guess if that's  
18 the date, November the 1st, I was in an Uber. I  
19 was asked to meet at Starbucks.

20 I got to Starbucks, Marnie and  
21 Lisa, on 16th and Arch.

22 Marnie and Lisa are sitting at the  
23 table. Lisa had her arms crossed. I don't know  
24 if they were fighting. I thought they were

1 arguing.

2 And Marnie told me, I want to let  
3 you know what you're walking into. We told  
4 Daniel everything.

5 And then she showed me, I believe,  
6 like a screen shot of her phone that she sent  
7 him -- she telegraphed him the letter.

8 She texted him the -- she wrote  
9 something by hand. Whenever she showed me and I  
10 tried to read it, but it was in cursive and I  
11 couldn't really understand.

12 So I said, what is -- what are  
13 you, you know, telling me this for? She said,  
14 because you're mentioned in the letter and I want  
15 to know what you're walking into, something --  
16 you know, we've had enough of Gregg and the gist  
17 of it was, like, you know, you're with us or  
18 against us.

19 Q. That's really important. So when  
20 you say the gist of it was, you're with us or  
21 against us, did Marnie or Lisa expressly state  
22 that to you or that was the feeling you got after  
23 meeting with them?

24 A. That was a -- the feeling I got.

1 It wasn't -- like after -- when we left the  
2 Starbucks and walked back, it wasn't like, oh,  
3 Matt, it's going to be okay. Whatever. They  
4 weren't storming to the office.

5 It wasn't -- I don't know, like,  
6 Matt, we want you to know, because, you know, we  
7 know you're going through, you know, some tough  
8 things right now. You have a baby at home and  
9 whatever else.

10 It was like -- we told Daniel,  
11 like, the dirt. And now things are gonna become,  
12 like, start popping up in the office and just  
13 want to give you the heads up, which I now  
14 believe was, like, they wanted me to also hammer  
15 at Daniel also about Gregg.

16 Q. Why do you believe that?

17 I'm sorry, I cut you off. I  
18 thought you were done.

19 A. Because after the meeting on  
20 November 5th, we went to that same place, that  
21 16th and Arch, except this time we were at tir na  
22 nOg with Thelma and the entire staff, Katrina,  
23 Delaney.

24 And Lisa said, you're a fucking

1 pussy and pointed in my face. Said you're a  
2 fucking pussy. And Marnie said, I'll never trust  
3 you ever or I'll never trust you again or  
4 something along those lines, because I didn't  
5 rise up in that meeting to drive a stake through  
6 Gregg's heart, like I guess they taught I was  
7 going to do after they told me on the 1st that  
8 that was happening.

9 Q. Why do you think they thought you  
10 would do that?

11 A. I mean, I guess -- I mean, I can't  
12 tell you why I would think that they would do  
13 something, but --

14 Q. Let's rewind a little bit, because  
15 I think we glossed over the meeting itself.

16 So there was -- Marnie files this  
17 complaint with Dr. Pipes. And shortly  
18 thereafter, there was a meeting that was held in  
19 the office, I believe, on November 4th or 5th.

20 Is that the meeting you were just  
21 discussing?

22 A. Yes, the first -- you know,  
23 whatever -- there was only really one meeting,  
24 you know, at that time.

1 Q. Who do you remember being at the  
2 meeting?

3 A. Everyone. Everyone but Gregg  
4 who -- I think he was supposed to be there and  
5 then he was told not to come.

6 Q. How do you know that?

7 A. Daniel told us when the meeting  
8 started, I believe, Gregg will not be coming.  
9 Something like that.

10 Q. How do you know he was told to  
11 come initially?

12 A. It was -- I don't remember the  
13 context of it, but it was -- like he was gonna be  
14 confronted on whatever was in the letter. I  
15 believe that was the purpose of it.

16 I mean, I --

17 Q. Everyone was at the meeting.  
18 Everyone can mean everyone in the City of  
19 Philadelphia. Everyone can mean everybody who's  
20 local to that office.

21 So to the extent you can recall  
22 any specific individuals who were present at the  
23 meeting, I would ask you to do that.

24 A. Everyone who was employed in the

1 Philadelphia -- in the main office.

2 So if we go around the table, it  
3 was Lisa, myself, Marnie, Daniel, Stacy, Tricia,  
4 Katrina, Delaney, Thelma.

5 Q. Okay. And what do you recall --

6 A. And Marc Fink. Sorry. I believe  
7 Marc was there, but I'm not, you know, like  
8 positive on that.

9 Q. What do you recall being discussed  
10 at the meeting?

11 A. Daniel said there were issues that  
12 have been raised and we wanted to sort it out or,  
13 you know, to hear firsthand what was -- what was  
14 going on.

15 And then -- then everybody just  
16 started coming out with stuff. You know, their  
17 own -- everybody had another story or argument,  
18 allegation, et cetera.

19 Q. There were some allegations that  
20 were made about Gregg's behavior in Israel when  
21 he took a trip with Lisa Barbounis.

22 My first question to you is, did  
23 you have knowledge of those allegations prior to  
24 the meeting on November 5th, 2018?



1           A.       I was shown text messages, I  
2 believe, that Lisa had sent to Tricia but then  
3 deleted and sent back to Lisa.

4                   And then she showed them to me  
5 saying whatever, you know, -- describing what  
6 took place there -- what she says took place  
7 there.

8           Q.       Do you recall when she showed  
9 those to you?

10          A.       I mean, it had to be after -- no.  
11 I mean, obviously sometime after the trip and  
12 before the November 5th meeting.

13          Q.       You were originally invited to go  
14 on that trip, correct?

15          A.       To Israel, yeah.

16          Q.       Yeah. And then you ultimately  
17 couldn't go and then Marnie was invited to go,  
18 correct?

19          A.       Yeah, I believe so.

20          Q.       Do you have any knowledge as to  
21 why Marnie declined to go?

22          A.       I think she said later that -- I  
23 don't know, that -- I don't know if she was not  
24 scared of going to the Middle East, but I don't

1 know, she has two teenagers at home. I really  
2 don't know the -- what her reason was.

3 Q. If you don't know, that's an  
4 acceptable answer. I don't want to you guess.

5 A. Sorry. I don't know how to play  
6 this game again. I don't know.

7 Q. This is an exercise trying to  
8 ascertain what you know. So we don't want you to  
9 guess at things.

10 Okay?

11 A. Yep.

12 Q. With -- there were other  
13 complaints of sexual harassment that were made  
14 about Gregg Roman.

15 Did you ever hear any complaints  
16 about Gregg sexually harassing or making comments  
17 of a sexual nature to the women who worked at the  
18 Philadelphia office?

19 A. No.

20 Q. And do you recall those  
21 allegations being discussed at the November 5th,  
22 2018, meeting?

23 MS. DiBANCA: I'm just gonna  
24 object to the form of the question. But

1           you can go ahead and answer.

2                   THE DEPONENT: To be honest with  
3           you, no, I don't remember specifics.

4                   I was, like, traumatized myself --  
5           outside of this, I had personal stuff  
6           going on. And I remember -- I mean, it  
7           was, like, -- I don't know, like, six  
8           people talking at once. And, you know,  
9           Stacy trying to defend or make sense of  
10          like, you know, certain things that  
11          people were saying.

12                  They were, like, you know -- like  
13          jumping down her throat every time she  
14          tried to get a word out.

15                  I remember I, like, defended  
16          Stacy. Oh, yeah, that's right. I  
17          defended Stacy. And that was like --  
18          like I would have done any other person  
19          that was my subordinate who was crying in  
20          the middle of a meeting with -- being  
21          attacked by everybody.

22                  And because I did that, that was  
23          perceived as that I was a loyalist to  
24          Gregg and, therefore, was a pussy and

1           couldn't be trusted.

2                     And that, I mean -- and that  
3           really is my sort of part in it.

4                     I think I said something, like, --  
5           there was an account or there was a donor  
6           that I had been building, like, a  
7           relationship with for the purpose of,  
8           like, a big gift. And, you know, I  
9           thought that I was going to see that,  
10          like, to fruition.

11                    Instead like, you know, Gregg was  
12          like, all right, Matt, thanks, we'll take  
13          it from here.

14                    And that, you know, I was -- I saw  
15          that as my chance to, like, prove, you  
16          know, myself to them and the  
17          organization.

18                    But, no, I didn't have knowledge  
19          of what was -- you know, later I see what  
20          they said.

21                    I know they were -- I guess they  
22          were talking about it. I don't know how  
23          much detail they said or they gave to  
24          Daniel in the room.

1 I remember looking over at Thelma,  
2 who was just sitting with her eyes closed  
3 letting it all wash over her, but other  
4 than that, that's my --

5 BY MS. SHIKUNOV:

6 Q. What does the donor have to do  
7 with anything?

8 A. I mean, everybody was complaining  
9 about Gregg, so I injected a complaint that, you  
10 know, I thought that he wasn't --

11 Q. Okay. That was a little -- that  
12 seemed a little out of left field. I wasn't sure  
13 where that came from.

14 A. That was my contribution to the --

15 Q. Okay.

16 A. -- to the --

17 Q. Meeting?

18 A. -- Gregg's assassination. Like  
19 whatever. You know, like that was my qualm.  
20 Like I really didn't have any other issues to  
21 raise like, you know, because he hadn't wronged  
22 me. I didn't have knowledge of any -- of  
23 anything to, like, support what was being said.  
24 So that was -- you know, when it came my turn,

1 that's what I put out there.

2 Q. In retrospect, do you think it was  
3 fair to Stacy to have her at the meeting?

4 A. I can't remember -- I mean, I  
5 think -- I don't know if she wanted to be there.

6 But, I mean, I know that she  
7 either didn't believe or disagree with a lot of  
8 the stuff that -- it was fair to Stacy or fair to  
9 the other people?

10 Q. I'm asking you about Stacy right  
11 now. We'll talk about the other people in a  
12 minute.

13 A. So do I think it was fair to her  
14 to have her there?

15 Q. Correct.

16 A. I don't know.

17 Q. Okay. And do you think, given the  
18 sensitivity and the nature of the complaints that  
19 were being raised by the women, it was  
20 appropriate to have the alleged sexual harasser's  
21 sister sit in on the meeting?

22 A. She was a member of the staff and  
23 it was an all-staff meeting.

24 If she -- I mean, it was gonna be,

1 does anybody have knowledge of this, anybody  
2 witness that. That's you know what, I guess, we  
3 thought was going to be taking place.

4 As somebody who sat in the office  
5 all day, every day, five days a week, then she  
6 would have been asked or required to be here.

7 So I guess to answer your  
8 question, no, it probably was not unfair to her.  
9 It would have been expected for her to be there.

10 I mean, they certainly didn't hold  
11 back on Stacy, if that's what you're asking. Oh,  
12 we're not going to say what we needed to say  
13 because Stacy was there.

14 It all came flying out.

15 Q. Did you believe any of the  
16 allegations that were raised about Mr. Roman when  
17 they were initially raised?

18 A. When they were initially raised?  
19 Yeah. Yeah.

20 At first, I mean, it was, like,  
21 surprising. And then, you know, there's --  
22 because there was, like, one person, two people,  
23 three people, it was like, well, you know --  
24 yeah, at first -- I think at first I doubted it.

1 Then I believed that -- and now I disbelieve, you  
2 know, just because of knowing what the nature of  
3 the complaints were and seeing the things made up  
4 about myself then, yeah. So I cast doubt on --  
5 on the complaints.

6 Q. When you say the complaints -- and  
7 we ran into this at a few other depositions. I  
8 just want to be clear.

9 There are complaints as in a  
10 document that's filed on the docket with the  
11 Court and there are complaints that the women  
12 raised to Dr. Pipes.

13 So we're speaking about complaints  
14 in the colloquial sense.

15 When you say you saw the  
16 complaints that were raised against you, are you  
17 referring to a Court document or are you  
18 referring to statements that were made to Dr.  
19 Pipes?

20 A. I'm referring to paperwork which  
21 was delivered to my home in New York City that --  
22 by a process server, like, this thick. I don't  
23 remember exactly what they were.

24 But, I mean, it was like McNulty,



1 Barbounis, Yonchek or whatever or -- I don't  
2 think Marnie's was in there.

3 But the other complaints were  
4 there, saying that, you know, that -- that all  
5 these things took place. That I'm, you know, --  
6 many of which I have direct knowledge or would  
7 contradict and say that that's a lie or that  
8 that's not how it happened.

9 I was taken back by that. I was,  
10 like, Facebook friends with everybody.

11 We were, you know, -- Katrina and  
12 Delaney wanted to rent my house even weeks after  
13 I had left. They wanted to rent my home in  
14 Philadelphia when I moved to New York.

15 Tricia was a babysitter for my  
16 daughter for months. Baby-sat my newborn  
17 daughter.

18 Lisa's husband would, you know, --  
19 I went to her daughter's first birthday. She  
20 came to my daughter's first birthday. Not just  
21 her, but her husband and her kids.

22 Like, I mean, we were all best  
23 friends.

24 And then suddenly I get served

1 with paperwork saying that -- that I'm a horrible  
2 person who contributed to their harassment at an  
3 organization, even though they threw me a  
4 going-away party the day that I left, you know.

5 Matt, we love you so much. Are we  
6 going to ever get -- what's it going to be here  
7 without you. We're at Continental for cocktails.  
8 There's a picture of it with us all smiling at  
9 the table.

10 And then, who knows how many weeks  
11 later, I'm the enemy of the state. They all  
12 unfriend me on Facebook. And then they name me  
13 in complaints.

14 So from my perspective, yeah, I  
15 cast doubt on the things that are written in that  
16 paperwork which I received.

17 And since then, have not wanted to  
18 even have one memory of the entire experience  
19 with them, and I apologize for saying this, but  
20 this deposition and they all are agonizing to  
21 recount all of these memories.

22 Q. Sir, you're aware that you were  
23 not named -- well, let me actually ask you this.

24 Did you ever see the complaint

1 that was filed by Ms. O'Brien?

2 A. No.

3 Q. And are you aware that you were  
4 not named in that complaint?

5 A. Well, I mean --

6 MS. DiBANCA: Object to the form  
7 of the question.

8 If he didn't see it, he couldn't  
9 say.

10 THE DEPONENT: I assume if I  
11 was --

12 BY MS. SHIKUNOV:

13 Q. Let me ask you the question this  
14 way.

15 I will represent to you that you  
16 were not named in Ms. O'Brien's complaint,  
17 because I wrote it.

18 A. Okay.

19 Q. And you are being called here  
20 today strictly as a fact witness.

21 Were you aware you were being  
22 called here today as a fact witness, meaning that  
23 you observed events that were relevant to the  
24 complaint?

1 MS. DiBANCA: I'm just gonna  
2 object to the question. You can go ahead  
3 and answer.

4 THE DEPONENT: I mean, I  
5 understand that I was called to give to  
6 -- to be asked questions and to answer  
7 them to the best of my ability of my  
8 recollection of what happened in my time  
9 at MEF.

10 BY MS. SHIKUNOV:

11 Q. Okay. And so you're saying you  
12 initially believed the allegations against  
13 Mr. Roman.

14 But what has changed your mind is  
15 the fact that several women filed complaints that  
16 named you and you felt that the allegations about  
17 yourself were untrue, so you extrapolate that to  
18 mean that all the other allegations in the  
19 complaint are also untrue?

20 A. Well, no, not because of that.

21 Yes, that contributes to it. But,  
22 you know, like, most -- in my head, I always  
23 think, well, maybe, you know, like Marnie slept  
24 with Gregg but she doesn't actually want to say

1 it.

2 Or maybe something, like, more  
3 happened than was let on with Tricia or Lisa. Or  
4 that they said that happened, but they don't  
5 actually want to say that because it's  
6 embarrassing to them or something.

7 So in my head, I was thinking,  
8 like, maybe, you know, it's like a Law and Order  
9 episode, you know, whatever.

10 But it came -- you know, when push  
11 came to shove, it was, like, that -- that nothing  
12 happened, I mean.

13 To my knowledge, nothing happened  
14 that would -- which was written that said  
15 happened. So, I mean, -- does that answer the  
16 question?

17 Q. Kind of.

18 But I'm gonna have to follow up  
19 based on something that you just threw out,  
20 because you just stating that this is the first  
21 time, I think, anybody has made that allegation  
22 or heard it.

23 Do you have any knowledge that Ms.  
24 O'Brien and Mr. Roman had a sexual relationship?

1 A. No.

2 Q. So can you clarify what you meant  
3 when you just stated that in your last answer?

4 A. Because Marnie was on the --  
5 because at the New Year's Party, Marnie -- I  
6 mean, at the holiday party, and before that,  
7 Marnie is handing me glasses of champagne or  
8 beers saying, like, just imagine Gregg with Leah  
9 in Israel and imagine -- it seemed like she was  
10 like, -- like, she was Gregg's a predator.

11 Like she -- I felt as if, like,  
12 there was something else, like, she knew that --  
13 like she had direct knowledge of something and --  
14 and that's why.

15 I thought maybe something happened  
16 between them. I mean, at the time that I was  
17 believing everything, I'm, like, well, Lisa and  
18 Tricia and whoever else are going to stay  
19 something's happened.

20 And if it did, then who's to say  
21 it didn't with Marnie.

22 So, yeah, that's why I said it.  
23 No, I don't have any knowledge or whatever --  
24 proof.

1 Q. Okay. I'm going to ask you  
2 another question.

3 MS. SHIKUNOV: Before I do,  
4 there's a 301 number on the line that is  
5 not muted and I'm getting noise from it.

6 So I would ask either that number  
7 mute themselves or, Alex, can you mute  
8 them unilaterally?

9 BY MS. SHIKUNOV:

10 Q. So you testified that you  
11 initially believed these complaints. And at some  
12 point in time you came to disbelieve them.

13 Do you recall specifically when it  
14 was that you started to question the allegations  
15 that were made?

16 A. Probably -- oh, yeah. I can tell  
17 you straight.

18 Yeah, here's one, is when I called  
19 a meeting, myself, after Gregg was removed,  
20 probably in December.

21 My wife was at work. I took my  
22 two-year-old daughter, got into an Uber, came to  
23 the office, gathered everyone in the conference  
24 room and said, from this point forward, you're no

1 longer to communicate with Gregg.

2 If his phone calls and -- the  
3 nature of the work relationship that's been just  
4 put in place, which is he can't come to the  
5 office and he's only being -- corresponding with  
6 staff to complete the assignments that he still  
7 has, and I said that's no longer the case.

8 I'm going to now bear the brunt of  
9 dealing with Gregg around the clock and to be the  
10 pass-thru between him and every other message and  
11 for every message, phone call, e-mail and  
12 directive that comes to the Philadelphia office.

13 I said, goodbye. Took my daughter  
14 and I left the office.

15 Q. Can I stop you for just one  
16 second, Mr. Bennett?

17 MS. SHIKUNOV: Somebody named  
18 Matthew Mainen just joined the call, do  
19 you know that is?

20 MS. DiBANCA: I do. He's with  
21 MEF.

22 MS. SHIKUNOV: Who is that?

23 MS. DiBANCA: I believe he is  
24 their associate in-house counsel. He's a



1 lawyer.

2 MS. SHIKUNOV: Okay. Okay. You  
3 can continue your answer.

4 MS. DiBANCA: I'm sorry. Matt, go  
5 ahead.

6 THE DEPONENT: Daniel called me,  
7 said -- or, no, I messaged him in the  
8 meeting -- no, first, I called Gregg. I  
9 said, I just want to let you know, you're  
10 not to communicate with any single --  
11 anyone in the office accept myself.

12 Hung up the phone.

13 Then I telegrammed Daniel, I  
14 believe, and I said, I just want you to  
15 know, I told everybody in the office  
16 whatever and then I left.

17 He called me while I was in the  
18 Uber. Eventually I connected with him.

19 He said, why did you do that? You  
20 know, obviously I didn't authorize you or  
21 permit you to do that.

22 I think we spoke on the phone. I  
23 communicated that the women were still  
24 complaining to me about Gregg -- about

1           having to work with Gregg, about  
2           contacting Gregg.

3                       So Daniel said, oh, man, I guess,  
4           get to the bottom of it myself. He went  
5           to each one of them individually and  
6           said, do you have a problem with Gregg.  
7           And they all said, no.

8                       And he came back and he said, the  
9           women said it's not them with a problem,  
10          but it's, in fact, you have a problem  
11          working with Gregg and you seem to have  
12          this obsession with removing Gregg from  
13          the office. And then I said okay.

14                      So the same women who told me that  
15          I was a pussy and was to never be  
16          trusted, because I didn't rise up and  
17          drive a stake through Gregg's heart,  
18          they're now the women telling you that  
19          they're fine and that everything's okay  
20          and that I'm a lunatic because I'm trying  
21          to get rid of him so aggressively.

22                      And like that, I knew that  
23          something's obviously going on.  
24          Something was obviously wrong.

1 And I began searching for other  
2 jobs. Probably the same day. Because I  
3 realized then that not only was it  
4 probably Marnie, who I had known was  
5 undermining me, but probably the rest of  
6 them.

7 And if they were -- and that's  
8 fine. If they're gonna be competitive  
9 when you want to go head to head with  
10 work product, then any day of the week.

11 But if you're gonna do it by lying  
12 and being two-faced, then, no. I don't  
13 want to work with anybody or be involved  
14 in an office or an organization with  
15 anybody, let alone everybody, who's gonna  
16 do such a thing.

17 BY MS. SHIKUNOV:

18 Q. So that kind --

19 A. When I say everybody, I'm  
20 referring specifically to Marnie, Lisa and Tricia  
21 who -- and not the younger girls who, I believe,  
22 were coerced.

23 Q. So is it your testimony here today  
24 that you believe that Marnie advised Dr. Pipes

1 that she preferred to speak with Mr. Roman than  
2 have you be the conduit?

3 A. I believe that he followed up on  
4 what I did, the meeting that I held. I know she  
5 wasn't happy in the meeting. She had sat there  
6 with her, you know, arms crossed like this.

7 Like she was saying, oh, okay,  
8 guys, we finally don't have to work with Gregg  
9 anymore guys. Look, Matt stepped up to do it.  
10 And I believe that, because I believe that she --  
11 she wanted to be that person, not me.

12 She saw that not because of my own  
13 actions, like my own desires to suddenly become  
14 director of the organization, but because they  
15 were prying me into it for months.

16 And there I was doing it and I  
17 think that that was the opposite of, you know,  
18 her desire or plan to become the eventual point  
19 person, director, whatever you want to call the  
20 leader of the Philadelphia office.

21 Q. Do you recall having a  
22 conversation with Dr. Pipes about this situation  
23 by telegram?

24 A. About this situation?

1 Q. Yes, about this situation, about  
2 you being the conduit between the women and  
3 Gregg?

4 A. Like as a result of this -- of the  
5 meeting that I called?

6 Q. Correct.

7 A. Yeah, I mess -- I believe I  
8 messaged him from the meeting in a telegram. I  
9 said, I just want to let you know I did this.

10 Q. And do you recall sending that  
11 message around January 25, 2019?

12 A. Yeah, that make -- that makes  
13 sense, yeah.

14 Q. And messaging him saying, I just  
15 instructed -- at 11:18 a.m., I just instructed  
16 the office staff that all communications with  
17 Gregg are to go through me and they are not to  
18 respond to him, unless I authorize it.

19 I'm available for Gregg 24/7, but  
20 I will not have him undermining me and inserting  
21 himself in what I am doing.

22 A. Yeah.

23 Q. Okay.

24 A. I mean, if you have the message,

1 that's what it I said.

2 Q. And immediately at 11:22 a.m., Dr.  
3 Pipes texts you back saying please call me.

4 Ten minutes later, approximately  
5 11:36, please call.

6 Do you recall getting those  
7 telegram messages?

8 A. Yeah. I was in the Uber and I  
9 wasn't going to have that conversation in an Uber  
10 with a two-year-old in the car.

11 So I waited until I got home.  
12 Then I tried to put her to sleep, so that I  
13 could, you know, talk to him and then talk about  
14 it.

15 Obviously I could tell he was  
16 upset about it, so...

17 Q. So it's your belief that sometime  
18 between 11:18 and 11:22 that all of the women in  
19 the office conspired against you and undermined  
20 you to Dr. Pipes after that meeting?

21 A. No. Certainly not.

22 But -- what, in three minutes?  
23 No. It would take Marnie a lot more time than  
24 that to weave a narrative that -- of whatever

1 they're saying.

2 Or if that's what they naturally  
3 believed, that Matt was so crazy that he is the  
4 one who wanted Gregg removed, that everything was  
5 fine and that I was -- I was the problem, then I  
6 don't think they came up with it in those three  
7 minutes. I think that it was much more long term  
8 than that.

9 Q. Well, you just testified that you  
10 had the meeting and you sent that telegram  
11 message to Dr. Pipes directly after the meeting.

12 A. Uh-huh.

13 Q. And you're saying sometime between  
14 the meeting and the time that you spoke with Dr.  
15 Pipes, the women intervened and all said you were  
16 crazy and had no idea what you were talking  
17 about.

18 So --

19 A. No. You asked me when did I  
20 know --

21 Q. Let me finish the question.

22 I'm curious as to when you believe  
23 that would have happened, given the fact that  
24 there's approximately three minutes between when

1 you texted Dr. Pipes and he asked for you to call  
2 him immediately.

3 MS. DiBANCA: And I'm just gonna  
4 object to the form of the question.

5 And, Matt, you can go ahead and  
6 answer.

7 THE DEPONENT: If I remember the  
8 last five minutes correctly, you had  
9 asked me when did I know. And then I  
10 told you when I called this meeting,  
11 following that -- following those  
12 actions, I believe that no one had my  
13 back in the office or no one wanted me to  
14 manage them or lead the organization.

15 And then I began looking for other  
16 jobs. And that's when I began to  
17 disbelieve the stories of the women. It  
18 was at that time.

19 Because if they were harassed, if  
20 they were bothered, if they were enduring  
21 psychological and whatever else they  
22 said, why wouldn't they tell Daniel then,  
23 yes, we wanted Matt to do that. Yes, we  
24 want Gregg gone. We don't want to talk



1 to him and communicate with him anymore.

2 BY MS. SHIKUNOV:

3 Q. Sir, do you have any direct  
4 knowledge of Mr. Marnie calling Dr. Pipes or  
5 communicating with Dr. Pipes that she preferred  
6 to communicate with Mr. Roman directly rather  
7 than have you do it for her?

8 A. Do I have any direct knowledge of  
9 it? No. Daniel -- other than --

10 Q. I'm sorry. Wait. Wait. I was  
11 asking you a follow-up question. We can't talk  
12 at the same time for Joyce's sake.

13 So my question to you is, is this  
14 just a suspicion of yours?

15 A. No. When Daniel went to discover  
16 why I did that, he said, they don't seem to have  
17 an issue with him.

18 FYI, like -- and I believe he went  
19 to them and asked them, you know.

20 You have to ask them. But, no, I  
21 don't have any, you know, direct knowledge of  
22 Marnie or anybody other than I believe he went to  
23 their offices. That's the way he would have done  
24 it. Knocked on the door, walked in and said --

1 or telegraphed with them and asked.

2 Q. With regard to these telegrams,  
3 you continued to exchange telegrams with Dr.  
4 Pipes after he asked you to call him, like you  
5 said, because you were trying to put your  
6 daughter down for a nap, correct?

7 A. That's what I remember, yeah.

8 Q. Okay. And at 12:55 p.m., you  
9 asked him, are you upset with me? He replied  
10 instantly, stating, very. You said, okay.

11 He said, in brief, show me does  
12 not mean grab power. It means do hard work. I'm  
13 waiting impatiently to talk on phone or in  
14 person.

15 And you replied at 1, that's how  
16 you see my trying to protect the office from  
17 Gregg as a telegraph. And he replied back, call  
18 me.

19 Did I -- do you have any other  
20 recollection of that conversation other than what  
21 I just reviewed with you?

22 A. No. Definitely not.

23 But, I mean, I remember realizing  
24 later that was, like, -- I was in a bad point in

1 my life.

2 I was being, like, direct with my  
3 supervisor, so to speak. And I was speaking --  
4 you know, more, like, off the cuff than I should  
5 have been. But, no, hearing you reading it back  
6 now, no, I don't remember.

7 Q. Okay.

8 A. Hearing you read it, I do  
9 remember. But I don't remember what came next or  
10 what came before, if that's what you're asking.

11 Q. Okay. And, sir, are you aware of  
12 the fact that anytime Marnie was asked to  
13 communicate with Gregg or work with Gregg  
14 directly, she complained about having to do that  
15 to Dr. Pipes?

16 MS. DiBANCA: And I'll object to  
17 the form of the question.

18 You can go ahead and answer what  
19 you know.

20 THE DEPONENT: I didn't even hear  
21 the question. You said, are you aware --  
22 BY MS. SHIKUNOV:

23 Q. My question to you is, are you  
24 aware that any time Marnie was directed to work

1 with Mr. Roman, she lodged a complaint about  
2 having to communicate with him or work with him  
3 directly to Dr. Pipes?

4 MS. DiBANCA: Objection stands.  
5 You can go ahead and answer.

6 THE DEPONENT: No, I'm not aware.  
7 She complained to me, but I wasn't  
8 aware of any formal complaints that she  
9 was making.

10 BY MS. SHIKUNOV:

11 Q. So you just said she complained to  
12 you about having to work with Gregg.

13 You have to say yes for the  
14 record. You can't nod your head.

15 MS. DiBANCA: I'm going to object  
16 to the form, because that's not exactly  
17 what he said. But go ahead.

18 Is there a question --

19 THE DEPONENT: It you wasn't like  
20 Marnie -- sorry.

21 So if the question is, did Marnie  
22 complain to me? No. But like she's mad,  
23 I'd like to make a complaint that I'm  
24 being made to work with Gregg.

1                   It was like, I just changed the  
2                   password on the security system to bump  
3                   Gregg or something like that. You know,  
4                   things like that that she believed that  
5                   Gregg still had -- she didn't like that  
6                   she still had a hand in her work.

7                   And, yeah. Does that answer the  
8                   question?

9       BY MS. SHIKUNOV:

10           Q.       It does. It does.

11           A.       She didn't make a complaint to me.

12           Q.       And it's your belief that rather  
13           than have somebody operate as a conduit between  
14           her and Mr. Roman so she didn't have to  
15           communicate to him, she undermined you to Dr.  
16           Pipes so that she could have the authority of  
17           communicating with Mr. Roman rather than  
18           yourself?

19           A.       I think she wanted Gregg gone.  
20           And I think she was happy to have me gone, too.  
21           I don't think she wanted to be a conduit to  
22           anything.

23                   I think she wanted complete and  
24           total control of the staff. I think that's how

1 she manages her children. I think that's her  
2 personality. I think that's just who she is.

3 And if you want to be competitive  
4 and aggressive, then fine.

5 Then I don't think there was any  
6 -- it had nothing to do with -- it had nothing to  
7 do with Gregg.

8 She's more than capable of  
9 standing her ground and fighting for herself  
10 physically and verbally.

11 No, she wanted it. She wanted --  
12 she wanted to be the top person in the office.  
13 She wanted more money. She wanted more  
14 authority. That's it. That's the way I see it.

15 Q. Why do you say that she's capable  
16 of defending herself physically?

17 A. She's -- she told me before, like,  
18 I don't know, she's like weight training,  
19 marathon runner.

20 Q. So you're making an observation of  
21 her general fitness?

22 A. Not her general fitness. But just  
23 her general, like, -- I think she's, like, a  
24 scrapper. I believe, like a scrapper. And

1 that's how they came to heads. That's why they  
2 disliked each other so much.

3 They were both this combative  
4 personality that doesn't back down and that  
5 stands their ground. And that's who they are.

6 Two Alpha males and I don't think  
7 Marnie is afraid of anything and neither is Lisa.

8 Q. Sir, you, yourself, were vying for  
9 the director role after Mr. Roman was removed  
10 from office, correct?

11 A. No, I wasn't vying -- I wasn't  
12 vying for it until, I guess, the time came and  
13 then I started thinking about the direction of  
14 the organization, whatever date that may be.

15 But I saw it as the opportunity to  
16 implement things, like, -- like migrating from  
17 Microsoft to Google, which I was, like, a  
18 proponent of, that Gregg didn't want to do.

19 So, you know, I started to see the  
20 opportunity to go directly to Daniel with those  
21 ideas.

22 Q. I want to stop you right there,  
23 because you're starting to get into specific  
24 ideas, which I don't think anybody needs for the

1 purposes of today.

2 A. Sorry.

3 Q. So my question to you is, were you  
4 vying for role of director after Gregg was  
5 removed from the office?

6 MS. DiBANCA: I'll object as asked  
7 and answered, but you can go ahead and  
8 answer the again.

9 THE DEPONENT: Can you be more  
10 specific? Was I vying?

11 Do you mean, like, was I competing  
12 for control, do you know what I mean?

13 Like competing for role of  
14 director?

15 BY MS. SHIKUNOV:

16 Q. I'll put it to you simply.

17 Do you recall exchanging telegram  
18 messages or communications with Dr. Pipes asking  
19 to be instated as director and arguing with him  
20 when he declined to give you the position?

21 A. Yeah, definitely. I don't  
22 remember what I said. But I said, why would --  
23 you know, what's the -- you know, why won't you  
24 make me just director? What's the issue?



1 Q. Okay. You mentioned, and we  
2 danced around it, and I didn't really get -- I  
3 want to kind of put an end cap on it.

4 So other than -- you said that --  
5 I'm trying to figure out how to ask this in a  
6 concise way so you just don't ask me to repeat  
7 the question. So bear with me first.

8 So you had testified probably 10  
9 or 15 minutes ago that you started to disbelieve  
10 the claims that were made by the women at the  
11 point in time that you offered to be a conduit  
12 between them and Gregg. And you were under the  
13 impression that they said that they did not need  
14 or want that.

15 Other than that understanding, was  
16 there anything else or was -- did anything else  
17 occur that caused you to start to disbelieve the  
18 women?

19 A. Well, other than what we had  
20 already mentioned, which was the receiving the --  
21 I don't know what they're called, what the  
22 official name is, the paperwork from the process  
23 server, which was -- which was later on -- and  
24 then through discovery of all that, yeah, like --

1 so, yes, it definitely does, after I left the  
2 organization.

3 I'm already with a new  
4 organization and received that. And especially  
5 when, you know, I was called for my last  
6 deposition, then I had to -- you know, to ask  
7 what is going on.

8 And then Mr. Seth or Mr. Carlton,  
9 whatever his name is, asking me like, you know,  
10 lots of ridiculous questions and I'm telling him  
11 it's just not how it went down.

12 So, you know, especially between  
13 then and now, thinking that -- about that is,  
14 like, -- it seemed like he genuinely believed,  
15 and I believe you, too, of the story that they're  
16 telling you.

17 And I'm just trying to answer --  
18 you know, provide answers to questions that shed  
19 light from a different narrative, from a  
20 different perspective, because it's the right  
21 thing to do.

22 I don't know.

23 Q. Between the time that you left the  
24 Middle East Forum in late February, early March

1 of 2019, and when you were served with the  
2 paperwork you were just referencing, did you  
3 remain in contact with anybody from the Forum  
4 other than Mr. Roman?

5 MS. DiBANCA: I believe he did  
6 answer that, but you can go ahead and  
7 answer it again.

8 THE DEPONENT: No. There was up  
9 until -- so I left on March the 8th. And  
10 I exchanged text messages with Katrina,  
11 Delaney, Lisa, Tricia.

12 So Katrina and Delaney, we  
13 exchanged messages that they wanted to  
14 rent my house.

15 Lisa and me exchanged messages  
16 that she asked me how is ZOA going, do  
17 they need anybody yet, meaning can I give  
18 her a job.

19 Same with Tricia. How's it going?  
20 She said Katrina had found another job  
21 and that she had a lot of work on her.  
22 She'd love to talk about coming to work  
23 for me at Zoa.

24 Thelma just out of being a very

1 loveable woman checked in, hey, Matt,  
2 just wanted to see how you're doing. Are  
3 you okay, blah, blah, blah.

4 And I believe that's it.

5 Those were my -- extent of my  
6 communications of everybody until one day  
7 I suddenly realized that they weren't  
8 friends with me on Facebook anymore and,  
9 et cetera.

10 BY MS. SHIKUNOV:

11 Q. When do you think the  
12 communication with the other women died off?

13 A. Not long after I started my new  
14 role there. So probably 30 to 60 days after  
15 March the 9th.

16 Q. And did you have any further  
17 communication with Marnie after you separated  
18 from employment?

19 A. No.

20 Q. Okay.

21 A. No.

22 Q. I want to ask you specifically  
23 about some telegram messages that were exchanged  
24 between you and Dr. Pipes on December 26, 2018.

1                   You had sent him a message at  
2   17:27. So I believe that's 5:27 military time.  
3   You subtract the 12. Saying, are you aware that  
4   Gregg called me yesterday?

5                   He indicated that he wasn't. And  
6   you reported to him that Gregg told you he was  
7   being asked to investigate Marnie and that you  
8   should not tell Dr. Pipes he had told you about  
9   it.

10                  Do you recall having a  
11   conversation with Mr. Roman wherein he informed  
12   you he was being asked to investigate Marnie?

13                  A.       I don't even remember that  
14   message.

15                  Can I see it?

16                  Q.       I can pull it up, but if you don't  
17   have any recollection of it for me just reading  
18   it to you and you're not gonna be able to answer  
19   questions about it, I'm not sure the fruitfulness  
20   of that exercise.

21                  MS. SHIKUNOV: But, Alex, do you  
22   want to pull those text messages up on  
23   the screen for me?

24                  MS. DiBANCA: Erica, may I

1 interject?

2 MS. SHIKUNOV: Sure.

3 MS. DiBANCA: So, Matt, if you  
4 don't have a recollection of it, it's  
5 fine to say you don't.

6 If you would prefer to see the  
7 messages to confirm that you don't -- if  
8 that is the case to confirm you don't  
9 have a recollection, that's also fine.

10 THE DEPONENT: Yeah, I mean, it  
11 was the worst year of my life. I'm sure  
12 I said a lot of things to Daniel. And I  
13 don't remember really any of them,  
14 especially during that period of time.

15 And I certainly don't remember  
16 saying that. But if they're there, I'm  
17 sure they're there, along with lots of  
18 other stuff that --

19 BY MS. SHIKUNOV:

20 Q. To give a brief summary, you're  
21 saying you don't dispute that you sent that, but  
22 you don't have any recollection of it now. And  
23 you don't know what you were talking about.

24 Is that fair?

1           A.       No, I mean -- I mean, it doesn't  
2       sound like it was something that I would say  
3       or -- naturally.

4                   But if you're telling me that you  
5       have it written down somewhere and that  
6       there's -- it's time stamped and you received it  
7       from Daniel, because we didn't -- because that's  
8       the only person who could give it to you, then  
9       I'm guessing that the message exists.

10                  But, I mean, I have to see, like,  
11       the context before and after and understand what  
12       was being talked about that there was an  
13       investigation or whatever.

14           Q.       You wrote, you said he was being  
15       asked to investigate Marnie. And I shouldn't  
16       tell you what he was telling me. Pipes says,  
17       what? You say, exactly. Pipes said, asked by  
18       whom. And you said, so I cleaned out my office,  
19       Daniel.

20                  Dr. Pipes, by whom? Unless you  
21       and I are on the same page, I cannot go on --

22           MS. DiBANCA: We're going to need  
23       to see it. It's too much to read.

24           MS. SHIKUNOV: Okay. I can pull

1           it up.

2                   THE DEPONENT: And what was the  
3           date? It's okay if you just tell me what  
4           was the date.

5 BY MS. SHIKUNOV:

6           Q.       It's December 26, 2018. And I'm  
7           just trying to figure out what you recall about  
8           that message.

9                   So give me just a second here.  
10          And for the record, I'm gonna be referring to  
11          text messages starting at D0006058.

12                   MS. DiBANCA: It's not text  
13          messages right, Erica?

14                   MS. SHIKUNOV: I'm sorry. It's  
15          telegram. I am not the most  
16          technologically intelligent person. So  
17          to me they're all text messages.

18                   MS. DiBANCA: And technically they  
19          are. They are texts and they're  
20          messages, so --

21                   THE DEPONENT: Ninety-five pages  
22          of telegram messages?

23 BY MS. SHIKUNOV:

24          Q.       There's quite a lot here, sir,



1 which is why I was trying to avoid having to pull  
2 it up for you.

3 A. Yeah. Well, let it be a lesson of  
4 now not to communicate with your boss.

5 Q. Okay. So I am starting at 17:27  
6 here.

7 Do you see where my cursor is  
8 hovering?

9 A. Yep.

10 Q. Are you aware that Gregg called me  
11 yesterday?

12 So go ahead and read along to the  
13 bottom of this page and I will scroll when you're  
14 ready.

15 MS. DiBANCA: Just for the record,  
16 can you tell me what date this is? I'm  
17 sure it's up there somewhere and I'm just  
18 going to rely on whatever you say.

19 MS. SHIKUNOV: It's December 26,  
20 2018.

21 I'm gonna pull it up and give you  
22 that page.

23 MS. DiBANCA: Okay.

24 MS. SHIKUNOV: I'm gonna have to

1 scroll through like three pages.

2 MS. DiBANCA: That's what I am --

3 THE DEPONENT: Can I see the top  
4 of the page?

5 BY MS. SHIKUNOV:

6 Q. Sure.

7 I'm sorry, I shouldn't have  
8 scrolled yet. Were you ready for me to scroll?

9 A. Yeah. Yeah. Go ahead.

10 Q. Okay.

11 A. Yeah, I think -- I mean, it's  
12 okay. I cleaned out my office.

13 I thought that guy Jakob was  
14 being -- was gonna come in as the new director of  
15 the organization at that point. And I had  
16 respect for his credentials and, you know,  
17 he's -- you know -- I don't know. What's your  
18 question?

19 Q. I was gonna say, I didn't ask you  
20 a question, but --

21 A. Oh, okay. Yeah.

22 Q. My first question to you is what  
23 you recall about the phone call wherein Mr. Roman  
24 informed you that he was investigating Ms.

1 O'Brien?

2 MS. DiBANCA: Could you just  
3 scroll up, Marnie -- Erica? I called you  
4 Marnie. Just so we're -- perfect.  
5 Thanks. There we go. Yep, 17:29.

6 MS. SHIKUNOV: Yes.

7 THE DEPONENT: Look, I wasn't on  
8 terms with Gregg that he would be  
9 asking -- that he would be telling me if  
10 he was doing something.

11 My only -- I can only believe that  
12 I said this because she believes that he  
13 was watching her.

14 She believed that the cameras and  
15 the internal -- there was an internal  
16 vestibule camera and that passwords on  
17 her computer that he could monitor or he  
18 could turn on the camera on her computer.  
19 And she was changing all the passwords  
20 and she believed that Gregg was looking  
21 into her work or something like that.

22 And if I said this, I was trying  
23 to figure out if that's the case. And  
24 I'm bluffing with Daniel to see if it is

1 the case.

2 The main thing is Jakob, is  
3 because I met Jakob. I believe he was a  
4 very smart person.

5 So at that time, it was -- things  
6 were unraveling. Yeah, I forgot about  
7 the Jakob.

8 BY MS. SHIKUNOV:

9 Q. So is it your testimony here today  
10 that you fabricated this conversation with  
11 Mr. Roman?

12 A. I don't remember -- I mean, you're  
13 asking me did I remember Gregg telling me that?  
14 I don't.

15 Q. Well, you just stated that you  
16 were bluffing.

17 So were you bluffing or do you  
18 just not recall if you had a conversation?

19 MS. DiBANCA: I'm gonna object.  
20 He did use the word bluffing, but I don't  
21 recall that he said he was bluffing.

22 MS. SHIKUNOV: Your objection is  
23 noted for the record.  
24

1 BY MS. SHIKUNOV:

2 Q. But, Matt, you started to answer  
3 when she made the objection. So can you repeat  
4 your answer?

5 A. To answer, I don't recall having  
6 the conversation with Gregg.

7 If the message is there, I  
8 obviously said it. And the best reason that I  
9 could think that I said it was because Marnie  
10 wanted to know if Gregg was -- had a way to spy  
11 on her, or whatever, which I was almost certain  
12 he wasn't.

13 He couldn't just because of my  
14 tech stuff and I understood how it worked.

15 MS. SHIKUNOV: Alex, we're done  
16 with this. Thank you so much for pulling  
17 it up.

18 I only have a few more questions  
19 for you. Okay?

20 THE DEPONENT: Okay.

21 BY MS. SHIKUNOV:

22 Q. So I -- there was some discussion  
23 in this case about a rumor that Ms. O'Brien had  
24 slept with Katrina Brady's father.

1 And there are some e-mails here  
2 that you had a conversation with, I believe, Pat  
3 McNulty and Lisa Barbounis after your separation  
4 from the Forum.

5 Do you recall having a discussion  
6 about this rumor with either Pat McNulty or Lisa  
7 Barbounis after you separated from the Forum?

8 A. Yeah. As I knew something was  
9 wrong then. Tricia called me randomly and said,  
10 do you remember when you told us that Marnie  
11 slept with Katrina's dad? And I said, Matt never  
12 told you anything. I said, if either --

13 Q. When you say Matt never told you  
14 anything, sir, are you referring yourself in the  
15 third person?

16 A. I'm referring to myself. I  
17 certainly didn't invent some scenario where I'm  
18 saying that Marnie slept with Katrina's dad.

19 And my best guess of where that  
20 came from is Lisa said Marnie probably fucked  
21 Katrina's dad and -- or something to get the job  
22 or something like that.

23 But I -- Katrina was my intern. I  
24 hired her. I trained her. I taught her

1 everything I knew.

2 And for her to believe that I'm  
3 gonna spread a rumor in the office -- that was  
4 one of the most hurtful things of all, of all of  
5 this ridiculous paperwork that I was served to  
6 think that, yeah, I'm starting a rumor in the  
7 office to malign a girl who I trained, helped her  
8 write and tried to get articles published, was  
9 going to let her live in my house, went out to  
10 eat with her and her fiance, introduce her to my  
11 wife and my kid and then I'm gonna spread rumors  
12 about her dad, who led one of our -- who led the  
13 NATO parliamentary assembly through Center City,  
14 Philadelphia, giving a historical tour. And  
15 that -- and Tricia's calling me on the phone, do  
16 you remember when you told us that you spread the  
17 rum -- or you said that? And I said, no, I don't  
18 remember telling you that.

19 So that's the conversation you're  
20 referring to.

21 Q. Okay. Is that the only  
22 conversation that you had about that after your  
23 separation?

24 A. About Katrina? About the rumor?

1 Q. Yes.

2 A. I believe so.

3 That's the only one I can recall,  
4 because I thought it was so ridiculous that -- I  
5 could tell it wasn't -- it's not how she talked.  
6 It's not how she would have asked me a question  
7 like that.

8 Q. Sir, you left the Middle East  
9 Forum to go work for the Zionist Organization of  
10 America, correct?

11 A. Correct.

12 Q. Do you still work there?

13 A. No.

14 Q. Okay. When did you leave that  
15 position?

16 A. I applied for a job in October or  
17 November of 2019 and began in the new  
18 organization -- yeah, I resigned in November.

19 I worked for another three weeks  
20 and then I accepted another role with another  
21 non-profit organization.

22 Q. What non-profit are you with now?

23 A. The American Friends of Tel Aviv  
24 Foundation.



1 Q. So since working at the Middle  
2 East Forum, you have proceeded to work with two  
3 other Zionist non-profits, correct?

4 MS. DiBANCA: Object to the form  
5 of the question. You can answer.

6 THE DEPONENT: ZOA is definitely a  
7 Zionist organization.

8 The organization I'm with now is a  
9 left-of-center organization.

10 Zionism isn't really in the  
11 mission station. But, yeah, they're  
12 pro-Israel. If you want to call it a  
13 non-profit organization, yes.

14 BY MS. SHIKUNOV:

15 Q. Okay. And in my vernacular, when  
16 I say Zionist, I refer to it as being pro-Israel.  
17 So I think we're saying the same thing.

18 Do you still -- when you were at  
19 the Zionist Organization of America, were you  
20 performing fundraising in that organization?

21 A. Yes. I was the director of the --  
22 National Director of Development.

23 Q. And your current organization, do  
24 you also do fundraising in your capacity at that

1 organization?

2 A. Yeah. It's part of it. But I'm  
3 the lead executive. I run the organization.

4 Q. Okay. When you left the Middle  
5 East Forum, you were permitted to take your  
6 laptop with you, correct, your device?

7 A. Yes.

8 Q. Were you asked to have the laptop  
9 wiped or to do anything to return any proprietary  
10 information that was on the laptop back to the  
11 Forum?

12 A. Was I asked?

13 Q. Correct.

14 A. I was the one who would be doing  
15 the asking at that point in March of, et cetera.

16 So I systematically wiped  
17 everything. And then one-by-one sent e-mail  
18 messages to Marnie and Daniel with the password  
19 saying, I am no longer in the administrative or  
20 Salesforce, I deleted it and removed my user  
21 account.

22 I no longer have access to  
23 mailchimp. I removed my user account.

24 This is the new admin password, et

1 cetera.

2 So I systematically, like, wiped  
3 myself and then handed over all of the admin  
4 credentials to Marnie and became the -- the  
5 person managing the relationship with the IT  
6 vendor that I was having migrate us to Google.

7 Q. Did you purchase the laptop or was  
8 it given to you?

9 A. I physically went to Apple to pick  
10 them up.

11 Q. I'm sorry. That was a bad  
12 question.

13 Upon leaving, did you purchase the  
14 laptop from MEF or was it given to you?

15 A. I think they agreed to, like, work  
16 it off, so to speak, if I stayed and then  
17 conducted the employee trainings and tutorials.  
18 And, like, up -- work until my last day before  
19 starting in my new role.

20 Then -- yeah, I believe there was,  
21 like, an amount that -- that was, like, factored  
22 into my -- you know, my last paycheck or  
23 something like that.

24 Q. Okay.

1 MS. SHIKUNOV: I don't have any  
2 further questions.

3 MS. DiBANCA: I don't have any  
4 questions.

5 MS. SHIKUNOV: All right. You are  
6 off the hook, Mr. Bennett. Thank you  
7 very much for your time this morning.

8 THE VIDEOGRAPHER: Off the record.  
9 The time is 11:28 a.m. Eastern.  
10  
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## 1 CERTIFICATE

2 I, MATTHEW BENNETT, do hereby  
3 certify that I have read the foregoing deposition  
4 given by me on January 12, 2021, and I certify it  
5 to be a true and correct transcript of my said  
6 deposition. In the event that I desire to make  
7 changes in the form or substance of my  
8 deposition, said changes will be listed below,  
9 along with my reasons for making them.

10 PAGE LINE CHANGE AND REASON FOR MAKING CHANGE

11 \_\_\_\_\_  
12 \_\_\_\_\_  
13 \_\_\_\_\_  
14 \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_  
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21 \_\_\_\_\_

22 \_\_\_\_\_  
23 MATTHEW BENNETT

24 Sworn and subscribed to before me this \_\_\_\_\_  
day of \_\_\_\_\_, 2021.

1 COUNTY OF LANCASTER :  
2 : SS  
3 COMMONWEALTH OF PENNSYLVANIA:

4 I, Joyce A. Wise, RMR, Court Reporter  
5 and Notary Public, do hereby certify that MATTHEW  
6 BENNETT, the witness, personally appeared before  
7 me, being first duly sworn or affirmed to testify  
8 to the truth, the whole truth, and nothing but  
9 the truth, in answer to the oral questions  
10 propounded to him by the attorneys for the  
11 respective parties, testified as set forth in the  
12 foregoing deposition.

13 I further certify that before taking of  
14 said deposition, the above witness was duly sworn  
15 or affirmed, that the questions and answers were  
16 taken down stenographically by the said Joyce A.  
17 Wise, RMR, approved and agreed to, and afterwards  
18 reduced to print by means of computer-aided  
19 transcription under the direction of the  
20 aforesaid Reporter.

21 In testimony whereof, I have hereunto  
22 subscribed my hand this 13th day of January 2021.

23   
24 Joyce A. Wise, RMR  
Notary Public

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<b>best</b> (6)	<b>car</b> (1)	<b>coerced</b> (1)	<b>contact</b> (1)
<b>better</b> (9)	<b>card</b> (1)	<b>coffee</b> (2)	<b>contacting</b> (1)
<b>big</b> (7)	<b>cared</b> (1)	<b>cohesive</b> (1)	<b>containing</b> (1)
<b>birthday</b> (2)	<b>careful</b> (1)	<b>colleague</b> (1)	<b>context</b> (2)
<b>bit</b> (1)	<b>carefully</b> (1)	<b>colleagues</b> (1)	<b>Continental</b> (1)
<b>black</b> (2)	<b>caring</b> (1)	<b>colloquial</b> (1)	<b>continue</b> (1)
<b>blah</b> (3)	<b>Carlton</b> (1)	<b>combative</b> (1)	<b>continued</b> (4)
<b>blank</b> (1)	<b>Case</b> (11)	<b>come</b> (10)	<b>contradict</b> (1)
<b>bluffing</b> (5)	<b>cast</b> (2)	<b>comes</b> (1)	<b>contributed</b> (2)
<b>blurt</b> (1)	<b>casual</b> (3)	<b>comfort</b> (1)	<b>contributes</b> (1)
<b>blurted</b> (1)	<b>caused</b> (1)	<b>comfortable</b> (1)	<b>contribution</b> (1)
<b>board</b> (1)	<b>caveat</b> (1)	<b>coming</b> (7)	<b>control</b> (4)
<b>bolster</b> (1)	<b>Center</b> (1)	<b>comment</b> (3)	<b>conversation</b> (14)
<b>bonuses</b> (1)	<b>certain</b> (3)	<b>comments</b> (3)	<b>conversations</b> (1)
<b>books</b> (2)	<b>Certainly</b> (6)	<b>COMMONWEALTH</b>	<b>coordinate</b> (1)
<b>boost</b> (1)	<b>CERTIFICATE</b> (1)	(1)	<b>cordial</b> (1)
<b>borderline</b> (1)	<b>certify</b> (4)	<b>communicate</b> (9)	<b>Correct</b> (20)
<b>boss</b> (1)	<b>cetera</b> (6)	<b>communicated</b> (3)	<b>correctly</b> (1)
<b>bothered</b> (1)	<b>champagne</b> (1)	<b>communicating</b> (2)	<b>corresponding</b> (1)
<b>bottom</b> (2)	<b>chance</b> (1)	<b>communication</b> (2)	<b>Counsel</b> (8)
<b>Brady's</b> (1)	<b>change</b> (5)	<b>Communications</b> (6)	<b>Counterclaim</b> (2)
<b>brain</b> (1)	<b>changed</b> (3)	<b>communications-</b>	<b>COUNTY</b> (1)
<b>break</b> (2)	<b>changes</b> (2)	<b>related</b> (1)	<b>couple</b> (1)
<b>breakdown</b> (1)	<b>changing</b> (1)	<b>compared</b> (1)	<b>course</b> (1)
<b>brief</b> (2)	<b>characterize</b> (1)	<b>compensate</b> (1)	<b>Court</b> (10)
<b>bring</b> (2)	<b>checked</b> (1)	<b>competing</b> (2)	<b>co-workers</b> (1)
<b>bringing</b> (1)	<b>Chestnut</b> (2)	<b>competitive</b> (2)	<b>crazy</b> (2)
<b>Brockman</b> (1)	<b>chewed</b> (1)	<b>complain</b> (1)	<b>creating</b> (1)
<b>brunt</b> (1)	<b>childhood</b> (1)	<b>complained</b> (3)	<b>credentials</b> (3)
<b>buddy</b> (2)	<b>children</b> (1)	<b>complaining</b> (2)	<b>crossed</b> (2)
<b>buffet</b> (1)	<b>Christmas</b> (1)	<b>complaint</b> (11)	<b>crying</b> (1)
<b>building</b> (2)	<b>circulated</b> (1)	<b>complaints</b> (17)	<b>cuff</b> (1)
<b>Bumble</b> (1)	<b>circumstances</b> (1)	<b>complete</b> (3)	<b>curious</b> (1)
<b>bump</b> (1)	<b>City</b> (3)	<b>compromising</b> (1)	<b>current</b> (2)
<b>business</b> (3)	<b>claims</b> (1)	<b>computer</b> (2)	<b>cursive</b> (1)
	<b>clarify</b> (2)	<b>computer-aided</b> (1)	<b>cursor</b> (1)
<b>&lt; C &gt;</b>	<b>CLARK</b> (1)	<b>concerns</b> (1)	<b>cut</b> (3)
<b>call</b> (11)	<b>classify</b> (1)	<b>concise</b> (1)	<b>&lt; D &gt;</b>
<b>called</b> (18)	<b>cleaned</b> (2)	<b>condition</b> (1)	<b>D.C</b> (2)
<b>calling</b> (2)	<b>clear</b> (5)	<b>conducted</b> (1)	<b>D0006058</b> (1)
<b>calls</b> (1)	<b>clock</b> (2)	<b>conduit</b> (5)	



<b>dad</b> (4)	<b>deteriorating</b> (2)	<b>drinking</b> (1)	<b>Everest</b> (2)
<b>D'Ambra</b> (1)	<b>deterioration</b> (1)	<b>drinks</b> (1)	<b>everybody</b> (25)
<b>danced</b> (1)	<b>detract</b> (1)	<b>drive</b> (9)	<b>everyday</b> (1)
<b>DANIEL</b> (27)	<b>Development</b> (8)	<b>driving</b> (1)	<b>everything's</b> (1)
<b>database</b> (4)	<b>device</b> (1)	<b>dropped</b> (1)	<b>evident</b> (2)
<b>date</b> (9)	<b>DiBANCA</b> (31)	<b>drove</b> (1)	<b>exact</b> (2)
<b>DATE/TIME</b> (1)	<b>DiBianca</b> (1)	<b>dual</b> (1)	<b>exactly</b> (6)
<b>dating</b> (5)	<b>died</b> (1)	<b>duly</b> (3)	<b>EXAMINATION</b> (2)
<b>daughter</b> (6)	<b>different</b> (5)	< E >	<b>example</b> (2)
<b>daughter's</b> (2)	<b>difficult</b> (2)	<b>early</b> (3)	<b>examples</b> (3)
<b>day</b> (27)	<b>diligent</b> (1)	<b>East</b> (7)	<b>exchange</b> (1)
<b>days</b> (4)	<b>diminish</b> (1)	<b>EASTERN</b> (7)	<b>exchanged</b> (4)
<b>day-to-day</b> (3)	<b>direct</b> (7)	<b>eat</b> (2)	<b>exchanging</b> (1)
<b>DC</b> (1)	<b>directed</b> (1)	<b>eating</b> (2)	<b>execute</b> (2)
<b>DE</b> (1)	<b>direction</b> (2)	<b>EBERT</b> (1)	<b>executive</b> (3)
<b>dealing</b> (2)	<b>directive</b> (1)	<b>effectively</b> (1)	<b>exercise</b> (3)
<b>debatable</b> (1)	<b>directly</b> (9)	<b>efforts</b> (1)	<b>ex-husband</b> (1)
<b>December</b> (4)	<b>Director</b> (30)	<b>either</b> (8)	<b>existed</b> (1)
<b>declined</b> (2)	<b>dirt</b> (1)	<b>e-mail</b> (4)	<b>exists</b> (1)
<b>decorated</b> (1)	<b>dirty</b> (1)	<b>e-mails</b> (1)	<b>expected</b> (1)
<b>decorations</b> (2)	<b>disagree</b> (1)	<b>Eman</b> (17)	<b>expenses</b> (1)
<b>defend</b> (1)	<b>disbelieve</b> (5)	<b>Eman's</b> (3)	<b>experience</b> (1)
<b>Defendant</b> (4)	<b>disciplinary</b> (1)	<b>embarrassing</b> (2)	<b>explicit</b> (3)
<b>Defendants</b> (1)	<b>disciplined</b> (3)	<b>employed</b> (1)	<b>explosive</b> (2)
<b>defended</b> (2)	<b>disconnect</b> (1)	<b>employee</b> (2)	<b>expressed</b> (1)
<b>defending</b> (1)	<b>discover</b> (1)	<b>employees</b> (2)	<b>expressing</b> (1)
<b>definitely</b> (9)	<b>discovery</b> (1)	<b>employment</b> (2)	<b>expressly</b> (1)
<b>degree</b> (1)	<b>discuss</b> (1)	<b>enduring</b> (1)	<b>extent</b> (2)
<b>Delaney</b> (8)	<b>discussed</b> (2)	<b>enemy</b> (1)	<b>extrapolate</b> (1)
<b>deleted</b> (2)	<b>discussing</b> (1)	<b>engineered</b> (1)	<b>eyes</b> (1)
<b>deliver</b> (1)	<b>discussion</b> (2)	<b>entire</b> (3)	< F >
<b>delivered</b> (1)	<b>disliked</b> (1)	<b>entirety</b> (2)	<b>fabricated</b> (1)
<b>departure</b> (1)	<b>dispute</b> (1)	<b>environment</b> (7)	<b>fabulous</b> (1)
<b>DEPONENT</b> (24)	<b>DISTRICT</b> (4)	<b>episode</b> (1)	<b>face</b> (4)
<b>deposition</b> (14)	<b>divide</b> (2)	<b>equal</b> (1)	<b>Facebook</b> (4)
<b>depositions</b> (2)	<b>docket</b> (1)	<b>Erica</b> (6)	<b>fact</b> (7)
<b>DEREK</b> (1)	<b>document</b> (2)	<b>erica@clarkhill.com</b>	<b>factored</b> (1)
<b>describe</b> (3)	<b>documents</b> (2)	(1)	<b>fair</b> (9)
<b>described</b> (2)	<b>doing</b> (25)	<b>escapades</b> (1)	<b>fairness</b> (2)
<b>describing</b> (2)	<b>donor</b> (3)	<b>escorted</b> (1)	<b>fall</b> (1)
<b>deserve</b> (3)	<b>door</b> (4)	<b>especially</b> (3)	<b>fallout</b> (1)
<b>deserved</b> (1)	<b>doors</b> (1)	<b>Esquire</b> (3)	<b>family</b> (4)
<b>desire</b> (5)	<b>doubt</b> (3)	<b>et</b> (7)	<b>fan</b> (1)
<b>desired</b> (1)	<b>doubted</b> (1)	<b>evening</b> (1)	<b>far</b> (2)
<b>desires</b> (1)	<b>downward</b> (1)	<b>event</b> (4)	<b>fast</b> (1)
<b>desk</b> (2)	<b>Dr</b> (22)	<b>events</b> (2)	<b>faster</b> (1)
<b>destiny</b> (1)	<b>Draconian</b> (1)	<b>eventual</b> (1)	<b>father</b> (1)
<b>detail</b> (1)	<b>draw</b> (1)	<b>eventually</b> (3)	<b>fault</b> (1)
<b>details</b> (1)	<b>dressed</b> (2)		

<b>February</b> (2)	<b>form</b> (8)	<b>going</b> (48)	<b>held</b> (4)
<b>feel</b> (10)	<b>formal</b> (2)	<b>going-away</b> (1)	<b>help</b> (2)
<b>feeling</b> (7)	<b>forth</b> (1)	<b>gonna</b> (25)	<b>helped</b> (1)
<b>feels</b> (1)	<b>FORUM</b> (24)	<b>Good</b> (14)	<b>hereunto</b> (1)
<b>feet</b> (1)	<b>forward</b> (2)	<b>goodbye</b> (1)	<b>hey</b> (3)
<b>felt</b> (16)	<b>found</b> (3)	<b>Google</b> (3)	<b>hierarchy</b> (1)
<b>females</b> (2)	<b>Foundation</b> (1)	<b>gotten</b> (2)	<b>highest</b> (1)
<b>fiance</b> (1)	<b>founded</b> (1)	<b>grab</b> (1)	<b>HILL</b> (1)
<b>field</b> (1)	<b>four</b> (3)	<b>GREGG</b> (66)	<b>hindsight</b> (1)
<b>fight</b> (1)	<b>fraternity</b> (1)	<b>Gregg's</b> (10)	<b>hired</b> (11)
<b>fighting</b> (2)	<b>free</b> (1)	<b>ground</b> (2)	<b>historical</b> (1)
<b>figure</b> (5)	<b>friend</b> (3)	<b>GROUP</b> (1)	<b>hold</b> (3)
<b>filed</b> (3)	<b>friendly</b> (1)	<b>guard</b> (1)	<b>holiday</b> (1)
<b>files</b> (1)	<b>friends</b> (10)	<b>guess</b> (38)	<b>Holly</b> (1)
<b>final</b> (1)	<b>front</b> (3)	<b>guessing</b> (1)	<b>home</b> (6)
<b>finally</b> (3)	<b>fruitfulness</b> (1)	<b>guests</b> (1)	<b>honest</b> (1)
<b>finance</b> (4)	<b>fruition</b> (1)	<b>guy</b> (5)	<b>hook</b> (1)
<b>finance-wise</b> (1)	<b>fucked</b> (1)	<b>guys</b> (6)	<b>horrible</b> (1)
<b>find</b> (1)	<b>fucking</b> (2)	<b>&lt; H &gt;</b>	<b>hosted</b> (1)
<b>fine</b> (11)	<b>fulfill</b> (2)	<b>Halloween</b> (1)	<b>hour</b> (6)
<b>finger</b> (1)	<b>full</b> (2)	<b>hammer</b> (1)	<b>hours</b> (4)
<b>finish</b> (4)	<b>fundraising</b> (6)	<b>hand</b> (3)	<b>house</b> (3)
<b>Fink</b> (2)	<b>funny</b> (1)	<b>handed</b> (1)	<b>hovering</b> (1)
<b>fire</b> (3)	<b>further</b> (3)	<b>handing</b> (1)	<b>How's</b> (1)
<b>fired</b> (7)	<b>future</b> (1)	<b>handle</b> (1)	<b>HR</b> (5)
<b>first</b> (17)	<b>FYI</b> (1)	<b>handled</b> (1)	<b>huh-uh</b> (1)
<b>firsthand</b> (2)	<b>&lt; G &gt;</b>	<b>handwritten</b> (1)	<b>Hung</b> (1)
<b>fist</b> (1)	<b>Game</b> (3)	<b>Hanukkah</b> (1)	<b>hurt</b> (1)
<b>fitness</b> (2)	<b>Gary</b> (8)	<b>happened</b> (15)	<b>hurtful</b> (1)
<b>five</b> (3)	<b>gathered</b> (1)	<b>happening</b> (2)	<b>husband</b> (2)
<b>five-minute</b> (1)	<b>gears</b> (2)	<b>happens</b> (1)	<b>&lt; I &gt;</b>
<b>five-month</b> (1)	<b>general</b> (7)	<b>happily</b> (1)	<b>idea</b> (1)
<b>flag</b> (1)	<b>generalization</b> (1)	<b>happy</b> (10)	<b>ideas</b> (2)
<b>flags</b> (1)	<b>generally</b> (2)	<b>harassed</b> (1)	<b>ignore</b> (1)
<b>flying</b> (1)	<b>genuine</b> (1)	<b>harasser's</b> (1)	<b>imagine</b> (4)
<b>follow</b> (1)	<b>genuinely</b> (1)	<b>harassing</b> (1)	<b>immediately</b> (4)
<b>followed</b> (1)	<b>getting</b> (3)	<b>harassment</b> (4)	<b>impatiently</b> (1)
<b>follower</b> (1)	<b>gift</b> (1)	<b>hard</b> (4)	<b>impede</b> (1)
<b>following</b> (3)	<b>girl</b> (1)	<b>harder</b> (1)	<b>implement</b> (1)
<b>follows</b> (1)	<b>girls</b> (3)	<b>hardest</b> (1)	<b>important</b> (3)
<b>follow-up</b> (1)	<b>gist</b> (2)	<b>hat</b> (3)	<b>impression</b> (1)
<b>food</b> (1)	<b>give</b> (13)	<b>hats</b> (1)	<b>inappropriately</b> (1)
<b>football</b> (2)	<b>given</b> (7)	<b>head</b> (7)	<b>incidents</b> (3)
<b>force</b> (2)	<b>giving</b> (1)	<b>heads</b> (2)	<b>INDEX</b> (1)
<b>foregoing</b> (2)	<b>glanced</b> (1)	<b>hear</b> (5)	<b>Indian</b> (2)
<b>foreign</b> (2)	<b>glasses</b> (1)	<b>heard</b> (2)	<b>indicated</b> (1)
<b>forever</b> (1)	<b>glossed</b> (1)	<b>hearing</b> (2)	<b>indicative</b> (1)
<b>forget</b> (2)	<b>go</b> (45)	<b>heart</b> (2)	<b>individually</b> (3)
<b>forgot</b> (1)			

<b>individuals</b> (3)	<b>janitors</b> (1)	<b>lead-in</b> (1)	<b>&lt; M &gt;</b>
<b>influence</b> (1)	<b>January</b> (5)	<b>leading</b> (1)	<b>mad</b> (1)
<b>information</b> (4)	<b>Jason</b> (1)	<b>Leah</b> (1)	<b>mailchimp</b> (1)
<b>information-gathering</b> (1)	<b>Jewish</b> (1)	<b>learn</b> (1)	<b>main</b> (2)
<b>informed</b> (2)	<b>job</b> (13)	<b>leave</b> (3)	<b>Mainen</b> (1)
<b>In-house</b> (2)	<b>jobs</b> (3)	<b>leaving</b> (2)	<b>making</b> (8)
<b>initially</b> (5)	<b>joined</b> (1)	<b>led</b> (5)	<b>male</b> (1)
<b>injected</b> (1)	<b>joining</b> (1)	<b>Lee</b> (2)	<b>males</b> (1)
<b>inquiry</b> (1)	<b>joke</b> (1)	<b>left</b> (16)	<b>malign</b> (1)
<b>inserting</b> (1)	<b>joked</b> (1)	<b>left-of-center</b> (1)	<b>man</b> (2)
<b>inspiration</b> (1)	<b>jovial</b> (1)	<b>legal</b> (1)	<b>manage</b> (3)
<b>inspired</b> (1)	<b>Joyce</b> (5)	<b>lesson</b> (1)	<b>managed</b> (2)
<b>instantly</b> (1)	<b>Joyce's</b> (1)	<b>letter</b> (3)	<b>management</b> (3)
<b>instated</b> (1)	<b>judgment</b> (1)	<b>letting</b> (1)	<b>manager</b> (2)
<b>instructed</b> (2)	<b>Judy</b> (4)	<b>liaison</b> (1)	<b>managerial</b> (1)
<b>intelligent</b> (1)	<b>jumping</b> (1)	<b>lie</b> (1)	<b>manages</b> (1)
<b>intended</b> (1)	<b>&lt; K &gt;</b>	<b>life</b> (6)	<b>managing</b> (3)
<b>interactions</b> (2)	<b>Katrina</b> (15)	<b>light</b> (2)	<b>marathon</b> (1)
<b>interested</b> (2)	<b>Katrina's</b> (3)	<b>Likewise</b> (1)	<b>Marc</b> (2)
<b>interests</b> (1)	<b>keep</b> (2)	<b>limit</b> (1)	<b>March</b> (5)
<b>interject</b> (1)	<b>Ken</b> (1)	<b>line</b> (3)	<b>Maria</b> (1)
<b>intermediary</b> (1)	<b>kid</b> (1)	<b>lines</b> (6)	<b>Mark</b> (1)
<b>intern</b> (3)	<b>kids</b> (1)	<b>Lisa</b> (64)	<b>Market</b> (3)
<b>internal</b> (2)	<b>kind</b> (4)	<b>Lisa's</b> (3)	<b>marketing-type</b> (1)
<b>international</b> (1)	<b>knew</b> (11)	<b>listed</b> (2)	<b>MARNIE</b> (128)
<b>interns</b> (2)	<b>Knocked</b> (1)	<b>listen</b> (1)	<b>Marnie's</b> (5)
<b>inter-personal</b> (1)	<b>know</b> (265)	<b>literally</b> (1)	<b>marriage</b> (1)
<b>interrupt</b> (6)	<b>knowing</b> (3)	<b>little</b> (5)	<b>Master's</b> (1)
<b>interrupting</b> (1)	<b>knowingly</b> (1)	<b>live</b> (1)	<b>Matt</b> (16)
<b>intervened</b> (1)	<b>knowledge</b> (17)	<b>local</b> (1)	<b>matter</b> (2)
<b>interviewed</b> (2)	<b>known</b> (2)	<b>lockdown</b> (1)	<b>MATTHEW</b> (9)
<b>introduce</b> (2)	<b>knows</b> (3)	<b>lodged</b> (1)	<b>Matt's</b> (1)
<b>invent</b> (1)	<b>&lt; L &gt;</b>	<b>log</b> (1)	<b>McNulty</b> (4)
<b>investigate</b> (3)	<b>laid</b> (1)	<b>logged</b> (1)	<b>mdibianca@clarkhill.c</b>
<b>investigating</b> (1)	<b>LANCASTER</b> (1)	<b>long</b> (3)	<b>om</b> (1)
<b>investigation</b> (1)	<b>language</b> (1)	<b>longer</b> (7)	<b>mean</b> (75)
<b>invited</b> (3)	<b>laptop</b> (5)	<b>look</b> (9)	<b>meaning</b> (4)
<b>inviting</b> (1)	<b>Lara</b> (17)	<b>looking</b> (6)	<b>means</b> (3)
<b>involved</b> (2)	<b>Lara's</b> (2)	<b>loosened</b> (1)	<b>meant</b> (2)
<b>iron</b> (1)	<b>Larry</b> (1)	<b>lost</b> (3)	<b>medical</b> (1)
<b>Israel</b> (3)	<b>late</b> (1)	<b>lot</b> (8)	<b>medication</b> (1)
<b>issue</b> (16)	<b>Laura</b> (21)	<b>lots</b> (2)	<b>meet</b> (7)
<b>issues</b> (9)	<b>Laura's</b> (1)	<b>loud</b> (1)	<b>meeting</b> (46)
<b>its</b> (1)	<b>LAW</b> (2)	<b>love</b> (2)	<b>meetings</b> (4)
<b>&lt; J &gt;</b>	<b>lawyer</b> (1)	<b>loveable</b> (1)	<b>MEF</b> (15)
<b>Jakob</b> (6)	<b>lead</b> (3)	<b>loyalist</b> (1)	<b>member</b> (3)
<b>Jamaica</b> (4)	<b>leader</b> (1)	<b>lunatic</b> (1)	<b>members</b> (1)
		<b>lunch</b> (4)	<b>memories</b> (1)
		<b>lying</b> (1)	

memory (1)  
 mentality (1)  
 mentioned (11)  
 mess (1)  
 message (11)  
 Messaged (3)  
 messages (15)  
 messaging (1)  
 met (3)  
 Meyer (1)  
 Microsoft (1)  
 MIDDLE (12)  
 migrate (1)  
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 migration (2)  
 military (1)  
 mind (3)  
 minute (3)  
 minutes (8)  
 mission (2)  
 misspell (1)  
 misspellings (3)  
 mistakes (1)  
 Molly (1)  
 money (2)  
 monitor (1)  
 month (2)  
 months (6)  
 morning (8)  
 motions (1)  
 motivate (2)  
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 multi-denominational (1)  
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 NATO (1)  
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 naturally (4)  
 nature (8)

need (11)  
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 needs (2)  
 neither (1)  
 never (21)  
 New (9)  
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 newsletter (1)  
 newsletters (2)  
 night (2)  
 Ninety-five (1)  
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 nOg (1)  
 noise (1)  
 non-profit (3)  
 non-profits (1)  
 North (1)  
 Notary (3)  
 noted (2)  
 November (13)  
 Number (3)  
  
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 objection (4)  
 O'BRIEN (8)  
 O'Brien's (2)  
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 observed (1)  
 obsession (1)  
 obvious (4)  
 obviously (14)  
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 occupying (1)  
 occur (2)  
 occurred (1)  
 October (5)  
 odd (1)  
 offended (1)  
 offered (1)  
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 offices (5)  
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 oh (12)  
 Okay (67)  
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oOo (1)  
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 opposite (3)  
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 Order (1)  
 organization (27)  
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 oversight (1)  
  
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 PA (1)  
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 PAGE (6)  
 pages (2)  
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 paperwork (6)  
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 party (3)  
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 password (3)  
 passwords (2)  
 Pat (2)  
 Patricia (4)  
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 Paul (1)  
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 PENNSYLVANIA (3)  
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 Perfect (2)  
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performance (4)  
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 period (2)  
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 person (35)  
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 personalities (1)  
 personality (4)  
 personally (2)  
 perspective (6)  
 Philadelphia (8)  
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 physically (4)  
 pick (2)  
 picture (4)  
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 PLACE (8)  
 Plaintiff (4)  
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 played (1)  
 plays (1)  
 PLC (1)  
 please (4)  
 PLLC (1)  
 point (20)  
 pointed (1)  
 pointing (3)  
 policy (2)  
 poorly-worded (1)  
 popping (1)  
 position (9)  
 positions (1)  
 positive (1)  
 post-November (2)  
 power (1)  
 predator (2)  
 prefer (1)  
 preferred (2)  
 pregnant (2)  
 pre-November (2)

preparing (2)		refer (1)	reviews (1)
PRESENT (3)	< Q >	referee (1)	rewind (1)
presented (1)	qualifications (1)	referencing (1)	rid (1)
pretty (4)	qualified (3)	referring (11)	ridiculous (3)
previously (1)	quality (2)	regard (6)	right (25)
print (1)	qualm (1)	regarding (1)	rise (2)
prior (9)	question (60)	regularly (1)	RMR (4)
privacy (1)	questioning (1)	reimbursements (1)	role (16)
privy (1)	questions (12)	related (1)	roles (4)
probably (15)	question's (1)	relations (2)	Roll (1)
problem (7)	quickly (2)	relationship (16)	ROMAN (25)
proceeded (1)	quite (1)	relationships (2)	Roman's (2)
proceeding (1)		relevant (1)	room (3)
process (2)	< R >	rely (1)	Rosie (2)
product (2)	raise (3)	remain (2)	Rosiebell (4)
products (1)	raised (7)	remark (3)	rough (1)
professional (2)	raises (1)	remember (43)	rum (1)
professionally (1)	raising (1)	remind (2)	rumor (5)
profile (1)	ran (1)	remote (3)	rumors (1)
progressed (1)	randomly (1)	removed (7)	run (4)
pro-Israel (2)	range (1)	removing (1)	runner (1)
Projects (3)	ranges (1)	rent (3)	
promise (1)	ranking (1)	repeat (4)	< S >
promised (1)	reaction (1)	repeated (1)	sake (1)
promoted (2)	read (8)	rephrase (1)	sales (1)
promotions (1)	reading (2)	replied (3)	SalesForce (2)
proof (1)	ready (2)	report (3)	sat (2)
proponent (1)	real (1)	reported (2)	satisfactory (1)
propounded (1)	realized (2)	REPORTER (9)	saw (8)
proprietary (1)	realizing (1)	Reporting (2)	saying (28)
propriety (1)	really (14)	reports (2)	says (2)
protect (1)	reason (6)	represent (1)	scared (1)
prove (2)	reasons (2)	reprimand (1)	scenario (1)
provide (1)	recall (23)	reprimanded (1)	scenes (2)
providing (1)	recalled (1)	required (1)	schedule (2)
prying (1)	recalling (2)	resigned (4)	scrapper (2)
psychological (1)	receive (3)	respect (2)	screamed (2)
Public (3)	received (4)	respective (1)	screaming (1)
published (1)	receiving (2)	respond (1)	screen (2)
pull (5)	Recess (1)	response (4)	scripted (1)
pulling (1)	recollection (6)	responsibilities (4)	scroll (4)
purchase (2)	recollections (1)	responsibility (4)	scrolled (1)
purpose (2)	recommended (1)	rest (6)	scrutinize (1)
purposes (2)	reconcile (1)	restaurant (4)	search (1)
push (1)	reconciliation (1)	result (1)	searching (1)
pushing (4)	record (12)	retrospect (1)	second (4)
pussy (4)	recorded (1)	return (1)	security (2)
put (11)	recount (1)	review (3)	see (23)
putting (3)	reduced (1)	reviewed (2)	seeing (1)



seek (1)	SMITH (1)	stenographic (1)	talked (8)
sending (1)	smoking (1)	stenographically (1)	talking (14)
sense (4)	social (2)	stepped (1)	tank (1)
sensitivity (1)	socialize (3)	stick (1)	tasked (1)
sent (10)	socialized (2)	stop (3)	taught (2)
separated (2)	socializing (1)	stories (1)	team (4)
separation (7)	somebody (7)	stormed (1)	tech (1)
serious (1)	something's (2)	storming (1)	technically (1)
served (3)	son (1)	storms (1)	technologically (1)
server (2)	soon (2)	story (2)	teenagers (1)
set (1)	Sorry (23)	straight (1)	Tel (1)
Seth (1)	sort (11)	strange (2)	telegram (8)
setting (1)	sound (1)	Street (5)	telegrammed (3)
sex (3)	sounds (1)	strictly (2)	telegrams (2)
sexual (6)	space (1)	stuff (10)	telegraph (1)
sexually (1)	speak (10)	style (2)	tell (20)
shake (1)	speakers (1)	subordinate (4)	telling (14)
share (1)	speaking (4)	subordinates (2)	Ten (1)
shared (1)	Special (3)	subscribed (2)	tension (2)
shed (1)	Specialist (2)	substance (2)	tensions (5)
She'd (1)	specific (10)	subtract (1)	term (1)
shift (2)	specifically (5)	sucking (1)	termination (1)
Shikunov (46)	specifics (2)	sucks (1)	terms (7)
shortly (1)	spelling (1)	sudden (1)	testified (8)
shot (1)	spending (1)	suddenly (4)	testify (4)
shouting (2)	spent (1)	sufficient (1)	testimony (4)
shove (1)	spoke (3)	suit (1)	text (6)
show (2)	spread (3)	Suite (1)	texted (2)
showed (4)	spy (1)	summary (2)	texts (2)
shown (1)	SS (1)	summer (1)	Thank (3)
shy (1)	Stacy (18)	supervise (2)	thanks (2)
sic (1)	staff (17)	supervised (2)	Thelma (10)
side (2)	stake (3)	supervisor (6)	thick (1)
sign (2)	stamped (1)	support (1)	thing (10)
simply (2)	standing (1)	supposed (2)	things (27)
single (5)	stands (2)	Sure (21)	think (98)
sir (10)	Starbucks (4)	surprising (1)	thinking (9)
sister (1)	start (7)	Survivor (2)	thinks (1)
sit (4)	started (27)	suspicion (1)	third (1)
sitting (4)	starting (5)	swear (1)	Third-Party (2)
situation (4)	state (2)	sworn (4)	thought (17)
six (2)	stated (3)	system (1)	three (9)
skills (1)	statements (1)	systematically (2)	threw (3)
slammed (1)	STATES (2)		throat (1)
sleep (1)	stating (2)	< T >	Thrones (2)
slept (4)	station (1)	table (5)	tie (1)
smart (1)	status (1)	take (10)	Tiffany (11)
smelled (1)	stay (3)	TAKEN (5)	time (65)
smiling (1)	stayed (2)	talk (19)	timeframe (1)

**timekeeping** (1)  
**timeline** (1)  
**times** (2)  
**tir** (1)  
**title** (2)  
**today** (11)  
**Today's** (2)  
**told** (33)  
**tone** (1)  
**top** (4)  
**total** (1)  
**touch** (1)  
**tough** (1)  
**tour** (1)  
**trained** (2)  
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**transcript** (3)  
**transcription** (1)  
**transcripts** (1)  
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**transpired** (2)  
**traumatized** (1)  
**travel** (3)  
**trial** (1)  
**Tricia** (24)  
**Tricia's** (1)  
**tried** (6)  
**trip** (3)  
**trouble** (1)  
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**trust** (2)  
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**truth** (3)  
**truthfully** (2)  
**try** (3)  
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**Tuesday** (1)  
**turn** (4)  
**tutorials** (1)  
**tweeting** (2)  
**twice** (1)  
**Twitter** (2)  
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**two-faced** (1)  
**two-year-old** (2)  
**type** (3)  
**types** (1)

< U >  
**Uber** (6)  
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**unfriend** (1)  
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**use** (2)  
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 < V >  
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**veered** (1)  
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**vernacular** (1)  
**versus** (2)  
**vestibule** (1)  
**Video** (4)  
**Videoconference** (1)  
**VIDEOGRAPHER**  
 (4)  
**virtually** (1)  
**vocal** (1)  
**vs** (2)  
**vulgar** (2)

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**Yeah** (68)  
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**York** (2)  
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**younger** (1)  
  
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**Zionism** (1)  
**Zionist** (5)  
**ZOA** (3)  
**Zoom** (2)